

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

ILLINOIS COMPUTER RESEARCH,)
LLC,)
Plaintiff and Counterclaim Defendant,)

v.)

GOOGLE, INC.,)
Defendant,)

and)

FISH & RICHARDSON P.C.,)
Defendant, Counterclaimant and)
Third-Party Plaintiff,)

v.)

SCOTT C. HARRIS,)
Third-Party Defendant and)
Counterclaimant,)

v.)

FISH & RICHARDSON P.C.,)
Defendant, Counterclaimant, Third-)
Party Plaintiff and Counterclaim)
Defendant.)

No. 07 C 5081

Submitted Under Seal

Judge Rebecca R. Pallmeyer

Magistrate Judge Maria Valdez

**FISH & RICHARDSON P.C.'S MOTION TO COMPEL
DISCOVERY AND COMPLIANCE WITH THE COURT'S ORDER**

For the reasons stated in Fish & Richardson P.C.'s Memorandum in Support of its Motion to Compel Discovery and Compliance with the Court's Order, a copy of which is filed simultaneously and incorporated herein, Fish & Richardson, by its attorneys, respectfully moves this Court under Rule 37 of the Federal Rules of Civil Procedure and Rule 37.2 of the Local Rules of the United States District Court for the Northern District of Illinois, for an Order compelling Scott Harris and Illinois Computer Research, LLC to produce immediately three

categories of documents: (1) documents created while Harris was at Fish & Richardson, relating to the possible assertion of the Harris patents against any entity that was then a Fish & Richardson client (the “Targeting of Clients Documents”); (2) any agreement that reflects the formation of an attorney-client relationship between the Niro Firm and Harris, ICR, or any other party asserting an interest in any of the Harris patents (the “Retention & Fee Agreements”); and (3) unredacted copies of all materials produced to Fish & Richardson on December 4, 2007.

In support of this motion, Fish & Richardson submits an accompanying memorandum of law.

Dated: December 11, 2007

Respectfully submitted,

FISH & RICHARDSON P.C.

By: s/ David J. Bradford
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One of Its Attorneys

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