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

ERICH SPECHT, an individual and doing business as ANDROID DATA CORPORATION, and THE ANDROID'S DUNGEON INCORPORATED,	))))	
Plaintiffs/Counter-Defendants,	)	
v.	)	Civil Action No. 09-cv-2572
	)	
GOOGLE INC.,	)	Judge Harry D. Leinenweber
	)	
Defendant/Counter-Plaintiff.	)	

PLAINTIFFS' CROSS-MOTION
FOR ENTRY OF A PROTECTIVE ORDER AND FOR SANCTIONS

Plaintiffs Erich Specht, Android Data Corporation and The Android's Dungeon Incorporated, by and through their attorneys, Novack and Macey LLP and Martin J. Murphy, respectfully request that this Court: (a) enter a Protective Order preventing Google from taking any further deposition testimony of Plaintiffs' counsel, Martin J. Murphy; and (b) award Plaintiffs sanctions for the conduct of Google's counsel at the initial deposition of Mr. Murphy. The grounds for this Motion are set forth in Plaintiffs' Memorandum In Opposition To Google's Motion To Compel And For Sanctions And In Support of Plaintiffs' Cross-Motion For A Protective Order And For Sanctions Against Google, filed contemporaneously herewith.

Respectfully submitted,

ERICH SPECHT, an individual and doing business as ANDROID DATA CORPORATION, and THE ANDROID'S DUNGEON INCORPORATED

By: /s/ P. Andrew Fleming
        One of Their Attorneys

P. Andrew Fleming
John F. Shonkwiler
John Haarlow, Jr.
NOVACK AND MACEY LLP
100 North Riverside Plaza
Chicago, IL 60606
(312) 419-6900
Doc. #359545

Martin Murphy
2811 RFD
Long Grove, IL 60047
(312) 933-3200

CERTIFICATE OF SERVICE

P. Andrew Fleming, an attorney, certifies that he served the foregoing by causing a true

and correct copy to be delivered by the ECF system to:

> Herbert F. Finn
> Richard D. Harris
> Jeffrey P. Dunning
> Cameron D. Nelson
> GREENBERG TRAURIG, LLP
> 77 West Wacker Drive
> Suite 3100
> Chicago, IL 60601

on this 25th day of May, 2010.

/s/ P. Andrew Fleming