

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

IN RE WEBLOYALTY.COM, INC.  
MARKETING AND SALES PRACTICES  
LITIGATION

MDL No. 07-01820 - JLT

Lead Case: 06-11620-JLT

**DEFENDANTS' RESPONSE TO  
PLAINTIFFS' MOTION FOR LEAVE TO FILE  
CONSOLIDATED AMENDED COMPLAINT**

Defendants hereby notify the Court that they do not oppose the filing of Plaintiff's Proposed Consolidated Amended Complaint, while preserving all rights to contest the legal and factual sufficiency of the Proposed Amended Complaint once it is approved for filing by the Court.

Respectfully submitted,

WEBLOYALTY.COM, INC, FANDANGO, INC.,  
VALUECLICK, INC., E-BABYLON, INC.,  
PRICELINE.COM, INC., SHANE NELSON  
GARRETT, AND MAXIM O. KHOKHLOV

By Their Attorneys

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Dated: June 15, 2007

Certificate of Service

I, Gabrielle R. Wolohojian, hereby certify that a true and accurate copy of the above document has been filed and served through the Court's electronic filing system, this 15<sup>th</sup> day of June, 2007. I also certify that I caused the above document to be served by mail upon the counsel listed on the attached Service List who do not receive electronically Notices of Electronic filing.

/s/ Gabrielle R. Wolohojian

## **SERVICE LIST 1:07-md-01820-JLT**

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