

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

SKYHOOK WIRELESS, INC.,	)	
	)	
Plaintiff and	)	
Counterclaim-Defendant,	)	Case No. 1:10-cv-11571-RWZ
	)	
v.	)	<b>PLAINTIFF SKYHOOK WIRELESS,</b>
	)	<b>INC.'S MOTION FOR ENTRY OF</b>
GOOGLE INC.,	)	<b>PROTECTIVE ORDER</b>
	)	
Defendant and	)	
Counterclaimant.	)	
_____	)	

Pursuant to Rule 26(c) of the Federal Rules of Civil Procedure, plaintiff Skyhook Wireless, Inc. ("Skyhook") respectfully moves this Court to enter Skyhook's First Proposed Protective Order excluding reexamination and non-broadening reissue proceedings from the prosecution bar. (Ex. 1.<sup>1</sup>) In the alternative, Skyhook respectfully moves this Court to enter Skyhook's Second Proposed Protective Order excluding from the prosecution bar only reexamination proceedings challenging a patent initiated by or at the behest of one of the parties to this action. (Ex. 2.)

In support of this motion, Skyhook relies on the Memorandum in Support of Skyhook's Motion for Entry of Protective Order, the Affidavit of Lina F. Somait and exhibits thereto, the complete records and files of this action, and such additional argument and evidence as may be presented to the Court.

WHEREFORE, Skyhook respectfully requests that the Court grant Skyhook's motion (1) to enter Skyhook's First Proposed Protective Order excluding reexamination and non-broadening

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<sup>1</sup> All citations in the form of "Ex. \_\_\_" are to the exhibits to the Somait Affidavit in support of Skyhook's Motion for Entry of Protective Order.

reissue proceedings from the prosecution bar; or (2) in the alternative, to enter Skyhook's Second Proposed Protective Order excluding from the prosecution bar only reexamination proceedings challenging a patent initiated by or at the behest of one of the parties to this action.

Respectfully submitted,

Skyhook Wireless, Inc.

By their attorneys

/s/ Thomas F. Maffei

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**Certificate of Compliance With Local Rule 37.1**

The parties conferred in good faith in an attempt to resolve this dispute, as evidenced by the exhibits attached to Ms. Somait's affidavit. The parties have not, however, been able to resolve this dispute.

*/s/ Thomas F. Maffei*

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Thomas F. Maffei

**Certificate of Service**

I, Thomas F. Maffei, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) on May 25, 2011.

*/s/ Thomas F. Maffei*

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Thomas F. Maffei