

EXHIBIT A

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VIA E-MAIL

Susan Baker Manning, Esq.
Bingham McCutchen LLP
2020 K Street NW
Washington, DC 20006-1806

Re: *Skyhook Wireless, Inc. v. Google Inc.,*
Case No. 10-cv-11571-RWZ (D. Mass.)

Dear Susan:

As you know, the Court has not yet issued a ruling on Skyhook's and Google's cross-motions for a protective order. While we are hopeful that the Court will soon enter a protective order, given the upcoming claim construction deadlines, we believe that the parties should begin producing documents now, including at least the documents that should have been produced with the parties' preliminary disclosures under Local Rule 16.6 as well as any documents that would be useful to the claim construction process.

We therefore propose that the parties produce documents with the understanding that they will be treated under the terms of Google's proposed protective order until a final protective order is entered by the Court. At that point, the documents would then be treated in accordance with the Court-issued protective order.

Please let me know whether Google is amenable to this proposal.

We look forward to your response.

Sincerely,

/s/ Lina F. Somait

Lina F. Somait