

EXHIBIT C

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Our File No.: 0000352152

July 6, 2011

Via Email

Lina Somait, Esq.
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1800 Avenue of the Stars, Suite 900
Los Angeles, California 90067-4276

**Re: *Skyhook Wireless, Inc. v. Google Inc.*
Case No. 1:10-cv-11571-RWZ (D. Mass.)**

Dear Lina:

I write in response to your letter of June 20, 2011 regarding the further production of documents prior to the Court's entry of a protective order. Skyhook suggests that the parties "begin" producing documents, and that they agree to treat all documents under the terms of Google's proposed protective order until the Court enters a protective order in this action. *See* Exhibit A to Memorandum of Law in Support of Defendant and Counterclaim-Plaintiff Google, Inc.'s Motion for Entry of a Protective Order (dkt. 30).

Google, too, hopes that the Court will soon enter a protective order. I must note that Google has already begun its production of documents. Google produced 4,424 pages of documents in this action on January 7, 2011 and April 15, 2011. In addition, Google has produced 128,285 pages of documents in the related state court action, and the vast majority of these have been in Skyhook's hands for over eight months. In order to make its state court production, Google processed over 9.5 million documents on an expedited basis. By the agreement of the parties, all of the state court documents are deemed produced in the federal court action, may be used in this action, and in fact have been used by Skyhook. *See, e.g.,* Skyhook's Infringement Contentions (dkt. 23).

That issue aside, Google is amenable to a mutual further production of documents in this action, including documents containing "Confidential" and "Highly Confidential - Attorneys' Eyes Only" confidential information, under a stipulation that all produced documents will be handled under the terms of Google's proposed protective order until such time as the Court enters a protective order, which would of course then govern.

As you know, the parties have agreed to specific, additional strictures that govern the inspection of source code. *See generally* Google's [Proposed] Protective Order ¶ 8. Given the extreme sensitivity of code, the agreed upon additional protections, and the likelihood that any meaningful review of code would need to be conducted by experts,

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rather than counsel who are officers of the court, any inspection of “Highly Confidential - Source Code” will need to take place after entry of the actual protective order.

I attach a draft stipulation. If Skyhook is amenable, please provide an executed copy for filing with the Court. Google stands prepared to immediately begin a mutual rolling production.

Sincerely yours,



Susan Baker Manning