

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

SKYHOOK WIRELESS, INC.,

Plaintiff,

v.

GOOGLE INC.,

Defendant.

CIVIL ACTION

NO. 10-cv-11571-RWZ

STIPULATION AND [PROPOSED] ORDER

WHEREAS Plaintiff Skyhook Wireless, Inc. (“Skyhook”) and Defendant Google Inc. (“Google”) filed a Joint Statement on December 7, 2010, providing in Section III.2 that the page limitation for each parties’ opening claim construction brief would be 25 pages, and for any responsive brief would be 15 pages;

WHEREAS Skyhook and Google, through their respective counsel, subsequently agreed to increase the page limit for their respective opening claim construction briefs, to be filed on September 14, 2011, from 25 pages to 35 pages, given the number of terms at issue, Google’s assertion that some of the claim terms in dispute are indefinite as a matter of law, and in an effort to assist the Court in its consideration of the issues to be presented; and

WHEREAS Skyhook and Google have for the same reasons agreed to increase the page limit for their respective responsive briefs to 25 pages;

THEREFORE, Skyhook and Google, hereby consent to and respectfully request the entry of the following order:

IT IS HEREBY ORDERED that

1. The page limit for the parties' opening claim construction briefs shall be 35 pages, and the page limit for the parties' responsive claim construction briefs shall be 25 pages.

IT IS SO ORDERED

Dated:

The Honorable Rya W. Zobel
United States District Court Judge

Dated: September 13, 2010

Respectfully Submitted,

Skyhook Wireless, Inc.,

Google Inc.,

By its attorneys,

By its attorneys,

/s/ Samuel Lu

/s/ Susan Baker Manning

Thomas F. Maffei (BBO 313220)
tmaffei@gtmllp.com
Daniel P. Tighe (BBO 556583)
dtighe@gtmllp.com
Douglas R. Tillberg (BBO 661573)
dtillberg@gtmllp.com
GRIESINGER, TIGHE & MAFFEI, LLP
176 Federal Street
Boston, Massachusetts 02110
(617) 542-9900

Jonathan M. Albano, BBO #013850
jonathan.albano@bingham.com
BINGHAM McCUTCHEN LLP
One Federal Street
Boston, MA 02110-1726, U.S.A.
617.951.8000

Morgan Chu (pro hac vice)
mchu@irell.com
John C. Hueston (pro hac vice)
jhueston@irell.com
Samuel K. Lu (pro hac vice)
slu@irell.com
IRELL & MANELLA LLP
1800 Avenue of the Stars, Suite 900
Los Angeles, California 90067-4276
(310) 277-1010

Robert C. Bertin (*admitted pro hac vice*)
robert.bertin@bingham.com
Susan Baker Manning (*admitted pro hac vice*)
susan.manning@bingham.com
BINGHAM McCUTCHEN LLP
2020 K Street, NW
Washington, DC 20006-1806
202.373.6000

William F. Abrams (*admitted pro hac vice*)
william.abrams@bingham.com
BINGHAM McCUTCHEN LLP
1900 University Avenue
East Palo Alto, CA 94303-2223
650.849.4400

CERTIFICATE OF SERVICE

I 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) and paper copies will be sent to those indicated as non-registered participants on September 13, 2010.

/s/ Susan Baker Manning, Esq.
susan.manning@bingham.com