

August 3, 2010

Via Electronic Filing

The Honorable Roslyn R. Maukopf
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Magistrate Judge Ramon E. Reyes, Jr.
United States District Court
Eastern District of New York
225 Cadman Plaza East, Room 263
Brooklyn, New York 11201

Re: *Web Tracking Solutions, LLC and Daniel Wexler v. Google, Inc.*
No. 1:08-cv-03139

Dear Judge Maukopf and Magistrate Judge Reyes:

The parties are writing jointly to request certain amendments to the schedule in the above-referenced case in light of the Report and Recommendation on the claim constructions at issue in this patent case (“R&R”), Docket Entry No. 69, that issued on July 27, 2010.

First, the parties jointly request an extension of time for filing objections to the R&R. Objections are currently due to be filed on August 10, 2010, and responses to objections are due to be filed on August 20, 2010. The parties respectfully request that the time for filing objections be extended to August 31, 2010, and the time for filing responses to objections to September 30, 2010. This request is based on commitments the parties have in other matters, as well as personal obligations for several attorneys involved in the case.

Second, the parties have agreed, subject to any contrary view of the Court, to not pursue further fact discovery pending the District Court’s ruling on objections to the R&R (there is no date for the close of fact discovery in the current case schedule). The reason for this agreement is that the scope of necessary discovery in the case will likely be significantly impacted by the final ruling on claim construction issues.

The parties are available for a telephonic conference to address any issues raised by this request. The parties thank the Court for its consideration.

Respectfully submitted,

/s/ Edward C. Flynn

Edward C. Flynn
ECKERT SEAMANS CHERIN &
MELLOTT, LLC
U.S. Steel Building
600 Grant Street, 44th Floor
Pittsburgh, PA 15219
Tel: 412-566-2063
Fax: 412-566-6099
eflynn@eckertseamans.com
Counsel for Plaintiffs

/s/ Edward J. DeFranco

QUINN EMANUEL URQUHART &
SULLIVAN
51 Madison Avenue, 22nd Floor
New York, NY 10010
Tel: 212-849-7106
Fax: 212-849-7100
eddefranco@quinnemanuel.com
Counsel for Defendant