

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

The Authors Guild, Inc., Association of American Publishers, Inc., et. al.,
:
:
Plaintiffs,
:
v.
:
Google, Inc.,
:
:
Defendants.
:
:

Case No. 05 CV 8136-DC

**FILED
ELECTRONICALLY**

**NOTICE OF MOTION FOR
RECONSIDERATION OF THE
COURT'S ORDER DATED
SEPTEMBER 2, 2009 AND
ENTERED SEPTEMBER 10,
2009**

PLEASE TAKE NOTICE that The American Society Of Media Photographers, Inc., Graphic Artists Guild, The Picture Archive Council Of America, The North American Nature Photography Association And Individual Photographers Joel Meyerowitz, Dan Budnik, Pete Turner And Lou Jacobs, Jr. ("Proposed Intervenors"), pursuant to Local Rule 6.3 and Fed. R. Civ. P. 24, 59 and 60, will hereby move this Court, on a date and at such time as may be designated by the Court, for an Order (attached hereto as Exhibit A): granting reconsideration of the Court's Order, dated September 2, 2009 and entered September 10, 2009, denying intervention, and in its place, reconsider the ruling and permit intervention in the event that the

Court determines that the Proposed Intervenors have been excluded from the Class. In support of this motion, Proposed Intervenors submit herewith a memorandum of law, dated September 24, 2009.

DATED: September 24, 2009

Respectfully submitted,

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[PROPOSED] ORDER

Having considered the motion of The American Society Of Media Photographers, Inc., Graphic Artists Guild, The Picture Archive Council Of America, The North American Nature Photography Association And Individual Photographers Joel Meyerowitz, Dan Budnik, Pete Turner And Lou Jacobs, Jr., (“Proposed Intervenors”) for reconsideration, and the memorandum of law in support thereof, and good cause appearing therefore:

1. Proposed Intervenors’ motion for reconsideration is hereby granted; and
2. Proposed Intevenors who are not class members shall be permitted to intervene for the limited purposes of objecting to the proposed class action settlement agreement and their preserving right to appeal therefrom.

IT IS SO ORDERED.

DATED: _____

THE HONORABLE DENNY CHIN
UNITED STATES DISTRICT JUDGE