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Attorneys for Defendant Traffic Information, LLC

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

GOOGLE INC., a Delaware corporation,

Civil No.: 09-642-HU

Plaintiff,

v.

TRAFFIC INFORMATION, LLC, a Texas
limited liability company,

Defendant.

**MOTION BY TRAFFIC
INFORMATION, LLC FOR
PROTECTIVE ORDER AND TO
STAY DISCOVERY**

CERTIFICATE OF COMPLIANCE WITH LR 7.1

Pursuant to LR 7.1, the parties made a good faith effort through telephone conferences and email to resolve the dispute but were unable to do so.

MOTION

Defendant Traffic Information, LLC (“Traffic”) moves the Court pursuant to Rule 26 of the Federal Rules of Civil Procedure for entry of a protective order and stay of discovery pending resolution of Traffic pending motion to dismiss Google Inc.’s Complaint for lack of subject matter jurisdiction.

In support of this Motion, Traffic submits herewith (1) its “Memorandum in Support of Motion By Traffic Information, LLC For Protective Order and To Stay Discovery”, and (2) “Declaration of C. Dale Quisenberry in Support of Motion By Traffic Information, LLC For Protective Order and To Stay Discovery”.

Dated this 16th day of December, 2009.

STOLL STOLL BERNE LOKTING & SHLACHTER P.C.

By: /s/ C. Dale Quisenberry
Robert A. Shlachter, OSB No. 911718
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-AND-

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