

**Robert A. Shlachter**, OSB No. 911718  
 Email: rshlachter@stollberne.com  
**Timothy S. DeJong**, OSB No. 940662  
 Email: tdejong@stollberne.com  
 STOLL STOLL BERNE LOKTING & SHLACHTER P.C.  
 209 S.W. Oak Street, Fifth Floor  
 Portland, Oregon 97204  
 Telephone: (503) 227-1600  
 Facsimile: (503) 227-6840

**C. Dale Quisenberry** (*pro hac vice* application to be filed)  
 Email: dquisenberry@pqelaw.com  
**John T. Polasek**, (*pro hac vice* application to be filed)  
 Email: tpolasek@pqelaw.com  
**Jeffrey S. David**, (*pro hac vice* application to be filed)  
 Email: jdavid@pqelaw.com  
 POLASEK, QUISENBERRY & ERRINGTON, L.L.P.  
 6750 West Loop South, Suite 920  
 Bellaire, Texas 77401  
 Telephone: (832) 778-6000  
 Facsimile: (832) 778-6010

*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 TO DISMISS FOR  
 LACK OF SUBJECT MATTER  
 JURISDICTION AND  
 ALTERNATIVE MOTION TO  
 TRANSFER VENUE**

**ORAL ARGUMENT  
 REQUESTED**

Certification of Compliance with LR 7.1

In compliance with LR 7.1, defendant's counsel certifies that they conferred by telephone with plaintiff's counsel in a good faith effort to resolve this dispute, but were unable to resolve the dispute.

Motion

Defendant Traffic Information, LLC ("Traffic") hereby moves pursuant to Rule 12(b)(1) of the Federal Rules of Civil Procedure to dismiss plaintiff Google Inc.'s Complaint for lack of subject matter jurisdiction. In the alternative, defendant moves pursuant to 28 U.S.C. §1404(a) to transfer this action to the Eastern District of Texas, Marshall Division, where three related patent infringement actions are now pending.

This motion is supported by (1) the accompanying MEMORANDUM IN SUPPORT OF TRAFFIC INFORMATION, LLC'S MOTION TO DISMISS FOR LACK OF SUBJECT MATTER JURISDICTION AND ALTERNATIVE MOTION TO TRANSFER VENUE, and (2) the DECLARATION OF KEVIN L. RUSSELL IN SUPPORT OF TRAFFIC INFORMATION, LLC'S MOTION TO DISMISS FOR LACK OF SUBJECT MATTER JURISDICTION AND ALTERNATIVE MOTION TO TRANSFER VENUE.

Dated this 14th day of August, 2009.

STOLL STOLL BERNE LOKTING & SHLACHTER P.C.

By: /s/ Timothy S. DeJong  
**Robert A. Shlachter**, OSB No. 911718  
**Timothy S. DeJong**, OSB No. 940662

209 S.W. Oak Street, Fifth Floor  
Portland, Oregon 97204  
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tdejong@stollberne.com

-AND-

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*Attorneys for Defendant Traffic Information, LLC*

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