

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

BRIGHT RESPONSE, LLC
F/K/A POLARIS IP, LLC

v.

GOOGLE, INC., et al.

2:07-CV-371-CE

UNOPPOSED MOTION BY PLAINTIFF FOR LEAVE TO AMEND COMPLAINT

Pursuant to Federal Rule of Civil Procedure 15(a), Plaintiff Bright Response, LLC (f/k/a Polaris IP, LLC) requests leave to file the amended complaint attached at Exhibit 1 hereto. Bright Response is mindful of the Defendants' pending Rule 12 motions challenging the sufficiency of Bright Response's Original Complaint. While Bright response submits that the Defendant's Rule 12 motions lack merit, the purpose of this amendment is to incorporate Bright Response's P.R. 3-1 infringement contentions in to the complaint, in order for the complaint to provide additional notice of Bright Response's infringement claims to the Defendants.

The Defendants do not oppose this motion for leave, provided that their rights to challenge the adequacy of the Amended Complaint are preserved. Bright Response is agreeable to the foregoing.

Wherefore, premises considered, Bright Response requests leave to file the Amended Complaint at Exhibit 1 hereto.

July 16, 2008

Respectfully submitted,

BRIGHT RESPONSE, LLC F/K/A POLARIS
IP, LLC

By: /s/ John J. Edmonds
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COUNSEL FOR PLAINTIFF BRIGHT
RESPONSE LLC, F/K/A POLARIS IP, LLC

CERTIFICATE OF CONFERENCE

Plaintiff has conferred by phone with Defendants and this Motion for Leave is unopposed.

July 16, 2008

/s/ John J. Edmonds
John J. Edmonds

CERTIFICATE OF SERVICE

I hereby certify that the counsel of record who are deemed to have consented to electronic service are being served today with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3). Any other counsel of record will be served by electronic mail, facsimile transmission and/or first class mail on this same date.

July 16, 2008

/s/ John J. Edmonds
John J. Edmonds