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

PA ADVISORS, LLC

Plaintiff,

v.

GOOGLE INC., ET AL.

Defendants.

No. 2:07-cv-480-TJW

JURY TRIAL DEMANDED

# PLAINTIFF'S RESPONSE TO WPP GROUP USA, INC.'S MOTION TO DISMISS PURSUANT TO FEDERAL RULES OF CIVIL PROCEDURE 12(B)(2) AND 12(B)(6) OR, IN THE ALTERNATIVE, FOR A MORE DEFINITE STATEMENT

Plaintiff PA Advisors, LLC ("PA Advisors") files this Response to WPP Group USA, Inc.'s Motion to Dismiss Pursuant to Federal Rules of Civil Procedure 12(b)(2) and 12(b)(6) or, in the Alternative, for a More Definite Statement ("WPP Group USA's Motion to Dismiss") (Dkt. No. 54).

PA Advisors hereby notifies the Court that WPP Group USA's Motion to Dismiss is now moot in light of Plaintiff's Notice of Voluntary Dismissal of WPP Group USA, Inc. (Dkt. No. 64) filed earlier today. PA Advisors filed the notice of dismissal, without prejudice, based on the representations made by WPP Group USA in its Motion to Dismiss and the supporting Declaration of Firouzeh Bahrampour filed therewith.

As such, PA Advisors asks the Court to deny as moot WPP Group USA, Inc.'s Motion to Dismiss Pursuant to Federal Rules of Civil Procedure 12(b)(2) and 12(b)(6) or, in the Alternative, for a More Definite Statement.

Dated: January 11, 2008 Respectfully submitted,

### PA ADVISORS, LLC

By: /s/ Amy E. LaValle

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# ATTORNEYS FOR PLAINTIFF PA ADVISORS, LLC

**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.

Dated: January 11, 2008 /s/ Amy E. LaValle