

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

NORTHEASTERN UNIVERSITY and  
JARG CORPORATION

Plaintiffs,

v.

GOOGLE INC.

Defendant.

Case No. 2:07-CV-486-CE

JURY TRIAL DEMANDED

**PLAINTIFFS' UNOPPOSED MOTION TO MODIFY AGREED PROTECTIVE ORDER**

Plaintiffs ask the Court to enter an Order pursuant to Paragraph 36 of the Protective Order [Dkt 42] to allow the parties to disclose information designated Confidential or Confidential Attorneys Eyes Only to mock jurors.<sup>1</sup> Plaintiffs submit the proposed amendment to the existing Protective Order attached hereto, and ask that it, or such other amendment that serves the legitimate confidentiality needs of the parties, be entered so that the parties may conduct mock trial exercises. Defendant has indicated that it does not oppose this motion.

Dated: February 1, 2011

Respectfully submitted,

/s/ Michael Valek

<sup>1</sup> “This Order is entered without prejudice to the right of any party to apply to the Court at any time for additional protection, or to relax or rescind the restrictions of this Order, when convenience or necessity requires. . . .” Agreed Protective Order [Dkt 42 ¶ 36].

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**CERTIFICATE OF CONFERENCE**

I certify that counsel for Plaintiffs has conferred with counsel for Defendants, who agreed to the relief requested in this motion.

*/s/ Michael Valek*

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**CERTIFICATE OF SERVICE**

The undersigned certifies that the foregoing document was filed electronically in compliance with Local Rule CV-5(a). As such, this document was served on all counsel who are deemed to have consented to electronic service. Local Rule CV-5(a)(3)(A). All other counsel of record not deemed to have consented to electronic service were served with a true and correct copy of the foregoing by email and/or fax, on this the 1st day of February, 2011.

*/s/ Michael Valek*

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