

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 FOR LEAVE TO EXCEED THE PAGE LIMIT

Plaintiffs Northeastern University and Jarg Corporation (“Plaintiffs”) file this Unopposed Motion for Leave to Exceed Page Limit respectfully requesting leave to exceed the page limit set forth in Local Rule CV-7(a)(3)(B) for Plaintiffs’ Response (“Response”) to Defendant’s *Daubert* Motion to Exclude the Expert Testimony of John Jarosz (“Motion”) (Dkt. 181).

Plaintiffs seek leave to file their Response, which is 22 pages in length excluding exhibits. The Response exceeds the page limit set forth in Local Rule CV-7(a)(2) by 7 pages, excluding exhibits. The additional pages are necessary because of the number of issues raised in Google’s Motion, which likewise exceeded the page limit set forth in Local Rule CV-7(a)(2), that require responsive briefing, the complexity of the issues, and the severity of the relief sought, including, *inter alia*, preclusion Plaintiffs’ damages expert’s, John C. Jarosz, opinions and testimony.

Plaintiffs’ counsel has conferred with counsel for Google, and Google’s counsel is not opposed to this motion.

Dated: March 28, 2011

Respectfully submitted,

/s/ Nicole E. Glauser

Otis W. Carroll, Jr. (Tx Bar No. 03895700)
Collin Maloney (Tx Bar No. 00794219)
IRELAND CARROLL & KELLEY
6101 S Broadway, Suite 500
Tyler, Texas 75703
Tel: (903) 561-1600
Fax: (903) 581-1071
Fedserv@icklkw.com

Constance S. Huttner
VINSON & ELKINS LLP
666 Fifth Avenue, 26th Floor
New York, New York 10103
Tel: (212) 234-0040
Fax: (212) 237-0100
chuttner@velaw.com

William B. Dawson (Tx Bar No. 05603600)
GIBSON, DUNN & CRUTCHER
2100 McKinney Avenue, Suite 1100
Dallas, Texas 75201-6912
Tel: (214) 698-3132
Fax: (214) 571-2900
wdawson@gibsondunn.com

David B. Weaver (Tx Bar No. 00798576)
Christopher V. Ryan (Tx Bar No. 24037412)
Michael Valek (Tx Bar No. 24044028)
Stephen C. Stout (Tx Bar No. 24060672)
James D. Shead (Tx Bar No. 24070609)
Nicole E. Glauser (Tx Bar No. 24050694)
Zeke DeRose, III (Tx Bar No. 24057421)
VINSON & ELKINS LLP
2801 Via Fortuna, Suite 100
Austin, Texas 78746
Tel: (512) 542-8400
Fax: (512) 236-3338
dweaver@velaw.com
cryan@velaw.com
mvalek@velaw.com
sstout@velaw.com
jshead@velaw.com
nglauser@velaw.com
zderose@velaw.com

Bernard C. Shek (CA Bar No. 191365)
VINSON & ELKINS LLP
525 University Avenue, Suite 410
Palo Alto, California 94301-1918
Tel: (650) 687-8200
Fax: (650) 618-1970
bshek@velaw.com

***ATTORNEYS FOR PLAINTIFFS
NORTHEASTERN UNIVERSITY AND
JARG CORPORATION***

CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that counsel for Plaintiffs has complied with the meet and confer requirements under Local Rule CV-7(h). Counsel for the parties conducted a meet and confer via email on March 26, 2011, and the present motion is unopposed.

/s/ Nicole E. Glauser

Nicole E. Glauser

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 28th day of March 2011.

/s/ Nicole E. Glauser

Nicole E. Glauser