

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

NORTHEASTERN UNIVERSITY and JARG CORPORATION,	)	
	)	
Plaintiffs,	)	Civil Action No. 2:07-cv-486-CE
	)	
v.	)	JURY TRIAL DEMANDED
	)	
GOOGLE INC.,	)	
	)	
Defendant.	)	
	)	
	)	
	)	

**JOINT MOTION FOR ENTRY OF PROTECTIVE ORDER  
AND TO EXTEND TIME FOR SUBMITTING A  
MUTUALLY AGREEABLE ATTACHMENT TO THE PROTECTIVE ORDER**

**I. INTRODUCTION**

Plaintiffs Northeastern University and Jarg Corporation and Defendant Google, Inc. have agreed to the provisions of the Proposed Protective Order (“Protective Order”) attached as Exhibit A. The parties jointly move the court for entry of the agreed upon Protective Order.

The Protective Order refers to an Attachment A intended to be executed by consultants retained by the parties for this litigation. The parties jointly request additional time to confer and submit a mutually agreeable Attachment A to the Protective Order.

**II. BRIEF BACKGROUND**

1. On August 21, 2008 the Court signed and entered the parties’ agreed-upon Discovery Order.

2. Jury selection for this matter is currently scheduled for April 4, 2011. The claim construction hearing is currently scheduled for October 6, 2010.

3. By Order signed August 27, 2008, (Dkt. No. 37), the Court ordered the parties to submit a mutually agreeable protective order to the Court by August 28, 2008.

4. The parties have agreed upon the Protective Order attached as Exhibit A.

### **III. RELIEF REQUESTED**

1. The parties jointly request that the Court sign and enter the Protective Order attached as Exhibit A.

2. The parties jointly request a two day extension of time, until and including Tuesday, September 2, 2008, for the parties to confer and submit a mutually agreeable attachment to the Protective Order. Jury selection is not scheduled until April 4, 2011, so there will be no adverse consequences to the Court's schedule by granting this brief extension. In addition, this motion is not opposed by Defendant.

WHEREFORE, the parties respectfully request (a) entry of the Protective Order attached as Exhibit A and (b) a two day extension of time, until and including Tuesday, September 2, 2008 for the parties to confer and submit a mutually agreeable attachment to the Protective Order to the Court.

Dated: August 28, 2008

Respectfully submitted,

/s/ Michael Valek

William B. Dawson (Tx Bar No. 05603600)

VINSON & ELKINS L.L.P.

3700 Trammel Crow Center

3001 Ross Avenue

Dallas, Texas 75201-2975

Tel: (214) 220-7926

Fax: (214) 999-7926

[bdawson@velaw.com](mailto:bdawson@velaw.com)

David B. Weaver (TX Bar No. 00798576)  
Christopher V. Ryan (TX Bar No. 24037412)  
Michael Valek (TX Bar No.24044028)  
R. Floyd Walker (TX Bar No. 24044751)  
Stephen C. Stout (TX Bar No. 24060672)  
VINSON & ELKINS L.L.P.  
2801 Via Fortuna, Suite 100  
Austin, Texas 78746  
Tel: (512) 542-8400  
Fax: (512) 236-3338  
[dweaver@velaw.com](mailto:dweaver@velaw.com)  
[cryan@velaw.com](mailto:cryan@velaw.com)  
[mvalek@velaw.com](mailto:mvalek@velaw.com)  
[fwalker@velaw.com](mailto:fwalker@velaw.com)  
[sstout@velaw.com](mailto:sstout@velaw.com)

Otis W Carroll, Jr.  
Collin Maloney  
IRELAND CARROLL & KELLEY  
6101 S Broadway, Suite 500  
Tyler, TX 75703  
Tel: 903-561-1600  
Fax: 903-581-1071  
[Fedserv@icklaw.com](mailto:Fedserv@icklaw.com)

Franklin Jones, Jr.  
JONES & JONES, INC. P.C.  
201 W Houston St., PO Drawer 1249  
Marshall, TX 75671-1249  
Tel: 903-938-4395  
Fax: 903-938-3360  
[maizieh@millerfirm.com](mailto:maizieh@millerfirm.com)

ATTORNEYS FOR PLAINTIFFS  
NORTHEASTERN UNIVERSITY AND  
JARG CORPORATION

/s/ Jason W. Wolff (with permission)

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Michael E. Jones (SBN 10929400)  
mikejones@potterminton.com  
POTTER MINTON  
A Professional Corporation  
110 N. College, Suite 500  
Tyler, TX 75702  
Telephone: (903) 597-8311  
Facsimile: (903) 593-0846

Ruffin B. Cordell (SBN 04820550)  
cordell@fr.com  
FISH & RICHARDSON P.C.  
1425 K Street, N.W., 11th Floor  
Washington, DC 20005-3500  
Telephone: (202) 783-5070  
Facsimile: (202) 783-2331

Howard G. Pollack (Admitted Pro Hac Vice)  
pollack@fr.com  
Shelley K. Mack (Admitted Pro Hac Vice)  
mack@fr.com  
Jerry T. Yen (CA SBN 247988)  
yen@fr.com  
FISH & RICHARDSON P.C.  
500 Arguello Street, Suite 500  
Redwood City, CA 94063  
Telephone: (650) 839-5070  
Facsimile: (650) 839-5071

Jason W. Wolff (Admitted Pro Hac Vice)  
wolff@fr.com  
FISH & RICHARDSON P.C.  
12390 El Camino Real  
San Diego, CA 92130  
Telephone: (858) 678-5070  
Facsimile: (858) 678-5099

ATTORNEYS FOR DEFENDANT  
GOOGLE INC.

**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). Pursuant to Fed. R. Civ. P. 5(d) and Local Rule CV-5(d) and (e), 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 28<sup>th</sup> day of August, 2008.

/s/ Michael A. Valek  
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