

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

IP INNOVATION L.L.C. AND	)	
TECHNOLOGY LICENSING	)	
CORPORATION,	)	CASE NO. 2:07cv503-LED
	)	
Plaintiffs,	)	
	)	JURY TRIAL DEMANDED
v.	)	
	)	
GOOGLE, INC.,	)	
	)	
Defendant.	)	

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**PLAINTIFFS' UNOPPOSED MOTION FOR LEAVE TO AMEND  
THEIR INITIAL DISCLOSURES PURSUANT TO PATENT RULES 3-1 AND 3-2**

Plaintiffs hereby move this Court for leave to amend their initial disclosures pursuant to Local Patent Rules 3-1 and 3-2, and in support thereof state as follows:

1. On June 9, 2008, Plaintiffs served the information required by the Court's Docket Control Order and Local Patent Rules 3-1 and 3-2.
2. On June 27, 2008, Plaintiffs received a letter from Defendant's counsel requesting additional information in Plaintiffs' initial disclosures pursuant to Local Patent Rules 3-1 and 3-2. (See Attached Exhibit A, letter from Defendant's counsel).
3. On July 2, 2008, counsel for Plaintiffs and Defendant had a telephone conference to discuss the issues raised by Defendant.
4. Plaintiffs, without conceding any deficiencies in their initial disclosures, agreed to amend their initial disclosures to address the issues raised by Defendant. (See Attached Exhibit B, e-mail from Defendant's counsel).

5. Plaintiffs' amended initial disclosures do not allege infringement of any additional claims or products. In fact, Plaintiffs' amended initial disclosures actually remove an allegation of infringement of claim 39 of U.S. Patent No. 5,675,819.

6. Plaintiffs served a copy of the amended initial disclosures on July 17, 2008.

7. Defendant does not oppose this motion, and the parties do not seek to change any due dates under the Court's schedule for this case.

8. Therefore, for the reasons stated herein, Plaintiffs respectfully request this Court grant them leave to amend their initial disclosures pursuant to Local Patent Rule 3-1 and 3-2.

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the foregoing **PLAINTIFFS' UNOPPOSED MOTION FOR LEAVE TO AMEND THEIR INITIAL DISCLOSURES PURSUANT TO PATENT RULES 3-1 AND 3-2** was served electronically on the below listed on July 17, 2008.

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