

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

IP INNOVATION L.L.C. AND
TECHNOLOGY LICENSING
CORPORATION,

Plaintiffs,

v.

GOOGLE INC.,

Defendant.

Case No. 2:07cv503-LED

JURY TRIAL DEMANDED

JOINT MOTION FOR ENTRY OF AGREED PROTECTIVE ORDER

Plaintiffs IP Innovation L.L.C. and Technology Licensing Corporation (“Plaintiffs”) and Defendant Google Inc. (“Defendant”) file this Joint Motion for Entry of Agreed Protective Order, in support of which they would respectfully show the Court as follows:

Discovery in this action may involve the disclosure of trade secrets and other confidential and proprietary business, technical, and financial information. As a result, Plaintiffs and Defendant request that the Court enter a protective order to protect against the disclosure of any such information and to ensure that such information will be used only for the purposes of this action.

A proposed Agreed Protective Order that has been approved by both Plaintiffs and Defendant is being filed herewith.

For the reasons discussed above, Plaintiffs and Defendant respectfully request that this Court enter the Agreed Protective Order submitted herewith and for all such other relief to which they may show themselves justly entitled.

Dated: August 26, 2008

Respectfully submitted,

By: /s/ David J. Beck

David J. Beck
Texas Bar No. 00000070
dbeck@brsfirm.com
Michael E. Richardson
Texas Bar No. 24002838
mrichardson@brsfirm.com
BECK, REDDEN & SECREST, L.L.P.
One Houston Center
1221 McKinney St., Suite 4500
Houston, TX. 77010
(713) 951-3700
(713) 951-3720 (Fax)

Mark G. Matuschak (admitted *pro hac vice*)
Richard A. Goldenberg (admitted *pro hac vice*)
WILMER CUTLER PICKERING HALE AND DORR LLP
60 State Street
Boston, MA 02109
(617) 526-6000
(617) 526-5000 (Fax)

John H. Hintz (admitted *pro hac vice*)
Victor F. Souto (admitted *pro hac vice*)
Ross E. Firsenbaum (admitted *pro hac vice*)
WILMER CUTLER PICKERING HALE AND DORR LLP
399 Park Avenue
New York, NY 10022
(212) 230-8800
(212) 230-8888 (Fax)

Elizabeth I. Rogers (admitted *pro hac vice*)
Anna T. Lee (admitted *pro hac vice*)
WILMER CUTLER PICKERING HALE AND DORR LLP
1117 California Avenue
Palo Alto, CA 94304
(650) 858-6042
(650) 858-6100 (Fax)

**ATTORNEYS FOR DEFENDANT
GOOGLE INC.**

By: /s/ Douglas M. Hall

T. John Ward, Jr.
Texas Bar No. 00794818
jw@jwfirm.com
WARD & SMITH LAW FIRM
111 W. Tyler Street
Longview, Texas 75601
(903) 757-6400
(903) 757-2323 (Fax)

Eric M. Albritton
Texas Bar No. 00790215
ema@emafirm.com
ALBRITTON LAW FIRM
P.O. Box 2649
Longview, Texas 75606
(903) 757-8449
(903) 758-7397 (Fax)

Raymond P. Niro (admitted *pro hac vice*)
Joseph N. Hosteny (admitted *pro hac vice*)
Arthur A. Gasey (admitted *pro hac vice*)
Paul C. Gibbons (admitted *pro hac vice*)
Douglas M. Hall (admitted *pro hac vice*)
David J. Mahalek (admitted *pro hac vice*)
NIRO, SCAVONE, HALLER & NIRO
181 West Madison, Suite 4600
Chicago, Illinois 60602
(312) 236-0733

**ATTORNEYS FOR PLAINTIFFS
IP INNOVATION L.L.C. AND TECHNOLOGY
LICENSING CORPORATION**