

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

SOFTWARE RIGHTS ARCHIVE, LLC,)	
Plaintiff,)	
)	Civil Action No. 2:07-cv-511-TJW
v.)	
)	JURY TRIAL DEMANDED
GOOGLE, INC.; YAHOO! INC.; IAC)	
SEARCH & MEDIA, INC.; AOL, LLC; and)	
LYCOS, INC.,)	
Defendants.)	
)	
)	

**SOFTWARE RIGHTS ARCHIVE, LLC AND GOOGLE INC.’S JOINT MOTION TO
ENTER AGREED SUPPLEMENTAL PROTECTIVE ORDER TO GOVERN
THE PRODUCTION/INSPECTION OF GOOGLE SOURCE CODE**

Plaintiff Software Rights Archive, LLC (“SRA”) and Defendant Google Inc. (“Google”) hereby move the Court for the entry of the Agreed Supplemental Protective Order to Govern the Production/Inspection of Google Source Code which is attached hereto as Exhibit “A.” SRA and Google make this Joint Motion subject to the following:

(1) The Agreed Supplemental Protective Order to Govern the Production/Inspection of Google Source Code which is attached hereto as Exhibit “A” shall govern the production/inspection of any Google source code in this matter until and unless further order of this Court.

(2) SRA and the Defendants in this action (including Google) have not yet reached agreement on a supplemental protective order to govern the production/inspection of all source code in this action.

(3) SRA and Google will continue to attempt to negotiate an agreed supplemental protective order to govern the production/inspection of all source code in this case. However, if such an agreed supplemental protective order is not agreed to by SRA, on the one side, and the Defendants (including Google) on the other side, both SRA and Google agree that the entry of Exhibit "A" hereto is not a waiver of, and is without prejudice to, the respective rights of SRA and/or Google to later challenge any of the provisions of Exhibit "A" hereto should SRA and/or Google need to submit competing versions of any provisions of a supplemental protective order to govern the production/inspection of source code in this case to the Court in the future.

Dated: February 1, 2010

Respectfully submitted,

By: /s/ Lee L. Kaplan (by permission)

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CERTIFICATE OF SERVICE

I hereby certify that counsel of record who are deemed to have consented to electronic service are being served this 1st day of February, 2010, with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3).

/s/ Thomas B. Walsh, IV
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