

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

**SOFTWARE RIGHTS ARCHIVE, LLC**

v.

**GOOGLE INC., YAHOO! INC., IAC SEARCH  
& MEDIA, INC., AOL LLC, AND LYCOS, INC.**

**Civil Case No. 2:07-cv-511 (CE)**

**GOOGLE’S UNOPPOSED MOTION FOR LEAVE TO EXCEED PAGE LIMITATIONS  
FOR ITS MOTION FOR PROTECTION**

Defendant Google Inc. (“Google”), through its undersigned counsel, respectfully moves this Court for leave to exceed page limitations for its Motion for Protection, filed on April 2, 2010. In support of Google’s request to exceed page limitations, Google states as follows:

1. The Local Rules of the District Court for the Eastern District of Texas, under CV-7(a)(2), limit Google’s Motion for Protection to 15 pages.
2. Google and Plaintiff Software Rights Archive, LLC (“SRA”) have been unable to resolve their differences regarding discovery into various areas of Google’s proprietary products and technologies. To most efficiently address these multiple disputes, Google presents them in a consolidated Motion for Protection. For this reason, Google requests leave from the Court to exceed the page limitation up to and including twenty-one (21) pages.
3. This request is not opposed by SRA.

WHEREFORE, Google respectfully requests that it be granted leave to exceed page limitations for its Motion for Protection, up to and including twenty-one (21) pages.

Dated: April 2, 2010

Respectfully submitted,

FISH & RICHARDSON P.C.

By: /s/ Thomas B. Walsh, IV  
Ruffin B. Cordell - Lead Attorney  
Texas Bar No. 04820550  
FISH & RICHARDSON P.C.  
1425 K Street, 11th Floor  
Washington, DC 20005  
Telephone: (202) 783-5070  
Facsimile: (202) 783-2331

Thomas B. Walsh, IV  
Texas Bar No. 00785173  
E-mail: walsh@fr.com  
Fish & Richardson P.C.  
1717 Main Street, Suite 5000  
Dallas, TX 75201  
Telephone: (214) 747-5070  
Facsimile: (214) 747-2091

Stephen A. Marshall  
Massachusetts BBO 666,200  
E-mail: smarshall@fr.com  
Fish & Richardson P.C.  
225 Franklin Street  
Boston, MA 02110-2804  
Telephone: (617) 542-5070  
Facsimile: (617) 542-8906

Harry L. Gillam, Jr.  
Texas Bar No. 07921800  
E-mail: gil@gillamsmithlaw.com  
Melissa R. Smith  
Texas Bar No. 24001351  
E-mail: melissa@gillamsmithlaw.com  
GILLAM & SMITH, L.L.P.  
303 South Washington Avenue  
Marshall, TX 75670  
Telephone: (903) 934-8450  
Facsimile: (903) 934-9257

Counsel for Defendant and Counter-Claimant  
GOOGLE INC.

**CERTIFICATE OF CONFERENCE**

The undersigned hereby certifies that a conference was previously held with Lee Kaplan, counsel for SRA, regarding the relief requested herein by Google. Counsel for SRA stated that SRA does not oppose this request.

/s/ Thomas B. Walsh, IV  
Thomas B. Walsh, IV

**CERTIFICATE OF SERVICE**

I hereby certify that counsel of record who are deemed to have consented to electronic service are being served this 2nd day of April 2010, with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3).

Lee L. Kaplan  
**SMYSER KAPLAN & VESELKA, L.L.P.**  
700 Louisiana, Suite 2300  
Houston, Texas 77002

Victor G. Hardy  
Andrew G. DiNovo  
Adam Price  
Jay D. Ellwanger  
**DI NOVO PRICE ELLWANGER & HARDY LLP**  
P.O. Box 201690  
Austin, Texas 78720

S. Calvin Capshaw  
Elizabeth L. DeRieux  
**CAPSHAW DERIEUX**  
1127 Judson Road, Suite 220  
P.O. Box 3999  
Longview, TX 75606-3999

Robert M. Parker  
Robert C. Bunt  
Charles Ainsworth  
**PARKER, BUNT & AINSWORTH, P.C.**  
100 East Ferguson, Suite 1114  
Tyler, Texas 75702

/s/ Thomas B. Walsh, IV  
\_\_\_\_\_  
Thomas B. Walsh, IV