

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

FPX, LLC d/b/a FIREPOND,	§	
	§	
	§	Civil Action No. 2:09-cv-00142-TJW
Individually and on Behalf of All Others	§	
Similarly Situated,	§	
	§	
Plaintiff,	§	CLASS ACTION COMPLAINT
	§	
v.	§	
	§	
GOOGLE, INC., YOUTUBE, LLC, AOL,	§	JURY TRIAL REQUESTED
LLC, TURNER BROADCASTING	§	
SYSTEM, INC., MYSPACE, INC. AND	§	
IAC/INTERACTIVECORP,	§	
	§	
Defendants.	§	

	§	
THE RODNEY A. HAMILTON LIVING	§	
TRUST and JOHN BECK AMAZING	§	Civil Action No. 2:09-cv-00151-TJW-CE
PROFITS, LLC, Individually and on Behalf	§	
of All Others Similarly Situated,	§	
	§	
Plaintiffs,	§	CLASS ACTION COMPLAINT
	§	
v.	§	
	§	
(1) GOOGLE INC.; AND	§	JURY TRIAL REQUESTED
(2) AOL LLC,	§	
	§	
Defendants.	§	

DEFENDANTS’ NOTICE OF EXPERT DISCLOSURE

Defendants Google Inc. (“Google”), YouTube, LLC, AOL Inc., Turner Broadcasting System, Inc.,¹ MySpace, Inc. and IAC/INTERACTIVECORP² (collectively, the “Defendants”) respectfully submit this Notice of Expert Disclosure as follows:

¹ Turner is not a proper defendant concerning the acts complained of in this action and should be dismissed. Turner does not waive, but rather expressly reserves, its rights. Based on the allegations in the complaint - which are denied

Defendants notify the Court and all counsel of record that today, pursuant to this Court's order of April 28, 2010 [Docket No. 62], they disclosed to Plaintiffs FPX, LLC, The Rodney Hamilton Living Trust and John Beck Amazing Profits, LLC their consolidated expert report and designation for all expert witnesses upon whom they intend to rely in support of their briefing in opposition to class certification. These disclosures were served by electronic mail and first class mail.

- it appears that one of Turner's subsidiaries, CNN Interactive Group, Inc. ("CNN Interactive") is the proper defendant.

² The proper defendant is IAC/InterActiveCorp's subsidiary, IAC Search & Media, Inc.

Respectfully submitted,

/s/ Charles L. Babcock

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ATTORNEYS FOR DEFENDANTS

CERTIFICATE OF SERVICE

I hereby certify that on July 7, 2010, I electronically submitted the foregoing document with the clerk of the court for the U.S. District Court, Eastern District of Texas, using the electronic case files system of the court. The electronic case files system sent a “Notice of Electronic Filing” to individuals who have consented in writing to accept this Notice as service of this document by electronic means. 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 first class mail today, July 7, 2010.

/s/ Charles L. Babcock

Charles L. Babcock