

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
(Alexandria Division)

ROSETTA STONE LTD.

Plaintiff,

v.

GOOGLE INC.

Defendant.

CIVIL ACTION NO. 1:09cv736  
(GBL / TCB)

**UNOPPOSED MOTION FOR ENTRY OF A PROTECTIVE ORDER**

COMES NOW Defendant Google Inc., by counsel, pursuant to the Federal Rules of Civil Procedure, and file this Unopposed Motion for Entry of a Protective Order, setting forth the following:

1. On July 10, 2009, Plaintiff Rosetta Stone Ltd., filed its Complaint against Defendant Google Inc. (“Google”) in the United States District Court for the Eastern District of Virginia, alleging various claims relating to Google’s advertising programs.

2. The parties have and expect to continue to request highly sensitive information during discovery in this action and have met and agreed upon procedures by which such information may be produced so as to avoid undue harm.

3. To this end, the parties seek the entry of an Agreed Protective Order in the form attached hereto as Exhibit A. Both parties have consented to the entry of this order.

WHEREFORE, in consideration of the foregoing the parties respectfully request that the Court enter an Agreed Protective Order in the form attached hereto as Exhibit A.

Respectfully Submitted,

GOOGLE INC.  
By counsel

/s/

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*Counsel for Defendant Google Inc.*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 11th day of December, 2009, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following::

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\_\_\_\_\_/s/\_\_\_\_\_  
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