## IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA ALEXANDRIA DIVISION

Plaintiff,

v.

GOOGLE INC.,

Defendant.

Civil Action No. 1:17-CV-00963-AJT-TCB

## GOOGLE LLC'S MOTION TO MODIFY THE CAPTION

Defendant Google LLC, formerly known as Google Inc., hereby moves for an order to modify the case caption to substitute Google Inc. with Google LLC.

On September 30, 2017, Google Inc. converted from a corporation to a limited liability company and changed its name to Google LLC. *See* Declaration of John K. Roche ¶¶ 3–4, Exs. A–B.

Undersigned counsel contacted Plaintiff Richard Clemons via email to fbiloyal707@gmail.com, the only contact information provided by Plaintiff in his complaint, to inform him that Google does not intend to seek a hearing on this motion and to ask whether Google may represent that he does not oppose this motion. *Id.* ¶ 5, Ex. C. To date, Plaintiff has not responded. *Id.* 

Google respectfully requests that the Court modify the case caption to substitute Google Inc. with Google LLC.

DATED: November 16, 2017 Respectfully submitted,

By: \_\_\_\_\_/s/ John K. Roche

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Counsel for Defendant Google LLC

## **CERTIFICATE OF SERVICE**

I hereby certify that on the 16th day of November, 2017, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, and I will send the document by email and U.S. mail to the following non-filing user:

Richard Clemons 211 N. Union St., Suite 100 Alexandria, VA 22314 fbiloyal707@gmail.com

Pro Se Plaintiff

By: /s/ John K. Roche

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