

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Norfolk Division

BID FOR POSITION, LLC,

Plaintiff,

v.

Civil Action No. 2:07cv582 (JBF-TEM)

AOL, LLC,
GOOGLE, INC.,
MICROSOFT CORP.,
and MIVA, INC.,

Defendants.

AOL, LLC,
GOOGLE, INC.,
and MICROSOFT CORPORATION,

Counterclaim Plaintiffs,

v.

BID FOR POSITION, LLC,

Counterclaim Defendant.

**MEMORANDUM IN SUPPORT OF
MOTION FOR SUBSTITUTION OF COUNSEL**

Defendant and Counterclaim Plaintiff, Google, Inc. (“Google”), by counsel, files this Memorandum in Support of its Motion for Substitution of Counsel seeking to substitute Stephen Edward Noona, Esquire and the law firm of Kaufman & Canoles, P.C. in place of Charles Paul Chalmers, Esquire and the law firm of Wilson Sonsini Goodrich & Rosati PC as counsel for Google in this matter. In support of its motion, Google states:

1. Google has requested and the other parties to this action have agreed that Google may substitute Stephen Edward Noona, Esquire and the law firm of Kaufman & Canoles, P.C. in place of Charles Paul Chalmers, Esquire and the law firm of Wilson Sonsini Goodrich & Rosati PC as counsel for Google in this matter and further that Charles Paul Chalmers, Esquire and the law firm of Wilson Sonsini Goodrich & Rosati PC may withdraw as counsel from this matter.

2. The withdrawal and substitution of counsel will not alter any deadlines in this case including the trial date which has not been set.

3. The other parties to this action do not object. Google is filing separately along with its motion an endorsed Agreed Order in the form of the proposed order attached as Exhibit 1 granting the relief sought in its motion.

WHEREFORE, Google, by counsel, respectfully requests that this Court grant its motion to allow the withdrawal and substitution of counsel in this matter.

Dated: February 8, 2008

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on February 8, 2008, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to the following:

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