## UNITED STATES DISTRICT COURT WESTERN DISTRICT OF TENNESSEE WESTERN DIVISION

**B.E. TECHNOLOGY, L.L.C.,** 

v.

**Civil Action No. 2:12-cv-02782** 

Plaintiff,

**JURY TRIAL DEMANDED** 

PANDORA MEDIA, INC.,

Defendant.

## DEFENDANT PANDORA MEDIA, INC.'S MOTION TO STAY PENDING RESOLUTION OF ITS MOTION TO TRANSFER VENUE

Defendant Pandora Media, Inc. respectfully moves this Court to stay all proceedings in this case, including proceedings called for in the Local Patent Rules, pending resolution of Pandora's motion to transfer this case to the Northern District of California, pursuant to 28 U.S.C. § 1404(a). The facts and legal authorities supporting this relief are set forth in the accompanying declaration and memorandum.

Respectfully submitted,

/s/Glen G. Reid, Jr.
Glen G. Reid, Jr. (#8184)
WYATT, TARRANT & COMBS, LLP
1715 Aaron Brenner Drive, Suite 800
Memphis, TN 38120-4367
Phone: 901.537.1000

Facsimile: 901.537.1010 greid@wyattfirm.com



/s/ Mark Vorder-Bruegge, Jr.
Mark Vorder-Bruegge, Jr. (#06389)
WYATT, TARRANT & COMBS, LLP
1715 Aaron Brenner Drive, Suite 800
Memphis, TN 38120-4367
Phone: 901.537.1000
Facsimile: 901.537.1010

mvorder-bruegge@wyattfirm.com

BANNER & WITCOFF, LTD.
J. Pieter van Es
Matthew P. Becker
Azuka C. Dike
Dargaye H. Churnet
Ten S. Wacker Dr. Ste. 3000
Chicago, IL 60606
(312) 463-5000

pvanes@bannerwitcoff.com
mbecker@bannerwitcoff.com
adike@bannerwitcoff.com
dchurnet@bannerwitcoff.com

Attorneys for Defendant

## **CERTIFICATE OF CONSULTATION**

The undersigned hereby certifies that prior to the filing of the foregoing motion, consultation was held with Richard Carter, counsel for plaintiff, over multiple days culminating in a telephone discussion on February 7, 2013. The consultation was not successful in reaching any agreement regarding the relief sought in the motion.

/s/ Mark Vorder-Bruegge, Jr. Mark Vorder-Bruegge, Jr.



## **CERTIFICATE OF SERVICE**

The foregoing document was filed under the Court's CM/ECF system, automatically effecting service on counsel of record for all other parties who have appeared in this action on the date of such service.

/s/Mark Vorder-Bruegge, Jr. Mark Vorder-Bruegge, Jr.

60323238.1 2/8/2013 2:54 pm

