

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION

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

Plaintiff,

v.

GOOGLE INC.,

Defendant.

Civil Action No. 2:12-cv-02830 – JPM-tmp

**DEFENDANT’S MOTION TO STAY PENDING RESOLUTION OF ITS  
MOTION TO TRANSFER VENUE PURSUANT TO 28 U.S.C. § 1404(a)**

Defendant Google Inc. respectfully moves this Court to stay all proceedings in this case, including proceedings called for in the Local Patent Rules, pending resolution of Google’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.

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### **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.  
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