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**UNITED STATES DISTRICT COURT
 SOUTHERN DISTRICT OF NEW YORK**

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The Authors Guild, Inc., Associational Plaintiff,	:	
Betty Miles, Joseph Goulden, and Jim Bouton,	:	
individually and on behalf of all others similarly	:	
situated,	:	Case No. 05 CV 8136-DC
	:	
Plaintiffs,	:	PLAINTIFFS' NOTICE OF
	:	MOTION FOR
v.	:	<u>CLASS CERTIFICATION</u>
	:	
Google Inc.,	:	FILED
	:	ELECTRONICALLY
Defendant.	:	
	:	
	:	
	:	
	:	
	:	
	:	
----- X	:	

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law, the Declaration of Joanne Zack (and the exhibits thereto), the Fourth Amended Class Action Complaint, and all prior pleadings and proceedings in this case, the undersigned Counsel for Plaintiffs in the above-captioned action will move, pursuant to Rule 23 of the Federal Rules of Civil Procedure, before the Hon. Denny Chin, United States Circuit

Judge, at a date and time convenient for the Court in Courtroom 11A at the United States District Court for the Southern District of New York, Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York 10007, for an Order:

1. Certifying the following class (“the Class”):

All persons residing in the United States who hold a United States copyright interest in one or more Books reproduced by Google as part of its Library Project, who are either (a) natural persons who are authors of such Books or (b) natural persons, family trusts or sole proprietorships who are heirs, successors in interest or assigns of such authors. “Books” means each full-length book published in the United States in the English language and registered with the United States Copyright Office within three months after its first publication. Excluded from the Class are the directors, officers and employees of Google; personnel of the departments, agencies and instrumentalities of the United States Government; and Court personnel.

2. Designating Betty Miles, Joseph Goulden, and Jim Bouton as

Representative Plaintiffs for the Class; and

3. Appointing Boni & Zack LLC as Lead Counsel, and Milberg LLP

and Kohn, Swift & Graf, P.C. as Class Counsel.

Dated: December 12, 2011

/s/ Joanne Zack
Joanne Zack
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Joshua D. Snyder
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