

Frank L. Corrado, Esquire
BARRY, CORRADO, GRASSI & GIBSON, P.C.
2700 Pacific Avenue
Wildwood, NJ 08260
(609) 729-1333 Fax: (609) 522-4927

Matthew J. Zimmerman (pro hac application pending)
Electronic Frontier Foundation
454 Shotwell Street
San Francisco, CA 94110
415-436-9333 x127
415-436-9993 Fax

Attorneys for Movant Datruthsquad.com a/k/a John Doe

TOWNSHIP OF MANALAPAN,)	SUPERIOR COURT OF NEW JERSEY
)	LAW DIVISION
Plaintiff,)	MONMOUTH COUNTY
)	DOCKET NO. MON-L-2893-07
vs.)	
STUART MOSKOVITZ, ESQ., JANE DOE)	<u>CIVIL ACTION</u>
and/or JOHN DOE, ESQ. I-V (these))	(LEGAL MALPRACTICE)
names being fictitious as their))	
true identities are presently))	NOTICE OF MOTION
unknown) and XYZ Corporation, I-V))	
(these names being fictitious as))	
their true corporate identities)	
are currently unknown))	

Defendants.

TO: LEN M. GARZA, ESQUIRE
DAVID PARKER WEEKS, ESQUIRE
Attorneys for Plaintiff

PLEASE TAKE NOTICE that the undersigned will apply to the
above named Court, at the Monmouth County Court House, Monmouth
County Superior Court, 71 Monument Park, Freehold, New Jersey on
December 21, 2007, at 9:00 a.m. o'clock, or as soon thereafter

as counsel may be heard, for an Order to quash the subpoena the Plaintiff served on Google, Inc., in this matter demanding information and material about anonymous speaker "daTruthsquad," a/k/a John Doe. At that time, John Doe will also move for a protective order preventing the Plaintiff from issuing any future discovery subpoenas to Google or any other individual or entity that might possess identity-related information, communications, or other records regarding Doe.

In support of this Motion, Doe will rely on the attached brief and Certification.

Pursuant to R. 1:6-2(d), the undersigned:

- () waives oral argument and consents to disposition on the papers.
() does not request oral argument at this time.
() requests oral argument.

A proposed form of order is annexed.

DATED:

4/29/02



FRANK L. CORRADO, ESQUIRE
Attorney for anonymous
speaker "daTruthsquad" a/k/a
John Doe