

**IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

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**GEOTAG INC.,**

**Plaintiff,**

**v.**

<b>FRONTIER COMMUNICATIONS CORP., et al.,</b>	<b>2:10-cv-00265</b>
<b>AROMATIQUE, INC.; et al.,</b>	<b>2:10-cv-00570</b>
<b>GUCCI AMERICA, INC.; et al.,</b>	<b>2:10-cv-00571</b>
<b>STARBUCKS CORP.; et al.,</b>	<b>2:10-cv-00572</b>
<b>RENT A CENTER, INC.; et al.,</b>	<b>2:10-cv-00573</b>
<b>THE WESTERN UNION COMPANY; et al.,</b>	<b>2:10-cv-00574</b>
<b>ROYAL PURPLE, INC.; et al.,</b>	<b>2:10-cv-00575</b>
<b>YAKIRA, L.L.C.; et al.,</b>	<b>2:10-cv-00587</b>
<b>EYE CARE CENTERS OF AMERICA, INC.</b>	<b>2:11-cv-00404</b>
<b>CHARMING SHOPPES INC.,</b>	<b>2:12-cv-00447</b>
<b>DAVID'S BRIDAL INC.,</b>	<b>2:12-cv-00452</b>
<b>FORMAL SPECIALISTS LTD.,</b>	<b>2:12-cv-00466</b>
<b>GUESS? RETAIL INC.,</b>	<b>2:12-cv-00469</b>
<b>JOS. A. BANK CLOTHIERS INC.,</b>	<b>2:12-cv-00476</b>
<b>AMERICAN GREETINGS CORPORATION,</b>	<b>2:12-cv-00520</b>
<b>ULTA SALON, COSMETICS &amp; FRAGRANCE INC.,</b>	<b>2:12-cv-00547</b>
<b>LUXOTTICA RETAIL NORTH AMERICA INC.,</b>	<b>2:12-cv-00550</b>

**UNOPPOSED MOTION TO WITHDRAW COUNSEL**

COMES Defendants identified below, and moves to withdraw Jane J. Du as attorney of record for Defendants identified below in the above-referenced matters, and requests that she be removed from the CM/ECF noticing list and any other service lists in this case. The law firm of Fish & Richardson P.C. will continue to represent Defendants identified below.

Defendants include the following parties:

1. America Greetings Corporation
2. Asics America Corp.
3. Avis Budget Group, Inc.
4. Avis Rent A Car System, LLC;
5. Best Maid Products, Inc.
6. BJ's Wholesale Club, Inc.
7. The Boeing Company
8. Brookstone Company, Inc.
9. Burger King Corp.
10. Cabela's, Inc.
11. Chanel, Inc.
12. Charming Shoppes Inc.
13. CiCi Enterprises, LP d/b/a/ Cici's Pizza
14. David's Bridal Inc.
15. Doctor's Associates, Inc. d/b/a Subway
16. Dollar Rent A Car, Inc.
17. Dollar Thrifty Automotive Group, Inc.
18. Dollar Tree, Inc.
19. Formal Specialists Ltd.
20. Gates That Open, LLC d/b/a/ Mighty Mule
21. Guess? Retail Inc.
22. Interstate Battery Systems of America, Inc.
23. Jack In The Box, Inc.
24. Jos. A. Bank Clothiers Inc.
25. Kohler Co.

26. Kubota Tractor Corp.
27. Learning Express, Inc.
28. Live Nation Worldwide, Inc.
29. Luxottica Retail North America Inc.
30. Mexican Restaurants, Inc.
31. PIP, Inc. d/b/a PIP Printing and Marketing Services
32. Polo Ralph Lauren Corp.
33. Radio Shack Corp.
34. Ralph Lauren Media, LLC
35. Rhino Linings Corp.
36. Richemont North America, Inc. d/b/a Cartier
37. Seven for All Mankind, LLC
38. Southern States Cooperative
39. Sterling Jewelers, Inc. d/b/a Jared The Galleria of Jewelry d/b/a Kay Jewelers
40. Ticketmaster L.L.C.
41. Thrifty, Inc.
42. Ulta Salon, Cosmetics & Fragrance, Inc.
43. Van Cleef & Arpels, Inc.
44. Vitamin Cottage Food Markets, Inc.
45. Winn-Dixie Stores, Inc.

Defendants have conferred with counsel for Plaintiff in this action, who does not oppose the relief requested in this motion.

Therefore, Defendants request that the Court withdraw Jane J. Du as attorney of record from the docket in this case.

Dated: February 27, 2013

Respectfully submitted,

*/s/ Jane J. Du*

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**COUNSEL FOR DEFENDANTS**

**AMERICA GREETINGS CORPORATION; ASICS AMERICA CORP.; AVIS BUDGET GROUP, INC.; AVIS RENT A CAR SYSTEM, LLC; BEST MAID PRODUCTS, INC.; BJ'S WHOLESALE CLUB, INC.; THE BOEING COMPANY; BROOKSTONE COMPANY, INC.; BURGER KING CORP.; CABELA'S, INC.; CHANEL, INC.; CHARMING SHOPPES INC.; CICI ENTERPRISES, LP D/B/A/ CICI'S PIZZA; DAVID'S BRIDAL INC.; DOCTOR'S ASSOCIATES, INC. D/B/A SUBWAY; DOLLAR RENT A CAR, INC.; DOLLAR THRIFTY AUTOMOTIVE GROUP, INC.; DOLLAR TREE, INC.; FORMAL SPECIALISTS LTD.; GATES THAT OPEN, LLC D/B/A/ MIGHTY MULE; GUESS? RETAIL INC.; INTERSTATE BATTERY SYSTEMS OF AMERICA, INC.; JACK IN THE BOX, INC.; JOS. A. BANK CLOTHIERS INC.; KOHLER CO.; KUBOTA TRACTOR CORP.; LEARNING EXPRESS, INC.; LIVE NATION WORLDWIDE, INC.; LUXOTTICA RETAIL**

**NORTH AMERICA INC.; MEXICAN RESTAURANTS, INC.; PIP, INC. D/B/A PIP PRINTING AND MARKETING SERVICES; POLO RALPH LAUREN CORP.; RADIO SHACK CORP.; RALPH LAUREN MEDIA, LLC; RHINO LININGS CORP.; RICHEMONT NORTH AMERICA, INC. D/B/A CARTIER; SEVEN FOR ALL MANKIND, LLC; SOUTHERN STATES COOPERATIVE; STERLING JEWELERS, INC. D/B/A JARED THE GALLERIA OF JEWELRY D/B/A KAY JEWELERS; TICKETMASTER L.L.C.; THRIFTY, INC.; ULTA SALON, COSMETICS & FRAGRANCE, INC.; VAN CLEEF & ARPELS, INC.; VITAMIN COTTAGE FOOD MARKETS, INC.; WINN-DIXIE STORES, INC.**

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the above and foregoing document has been served on February 27, 2013, to all counsel of record deemed to have consented to electronic service via the Court's CM/ECF system per Local Rule LR 5.1.

*/s/Jane J. Du*  
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Jane J. Du

**CERTIFICATE OF CONFERENCE**

The undersigned hereby certifies that the parties have complied with the meet and confer requirements in Local Rule CV-7(h). Counsel for Defendants and Geotag, Inc. have conferred regarding the relief requested herein, and are in agreement that the relief is unopposed.

*/s/ Jane J. Du*  
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Jane J. Du