

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

THE AMERICAN SOCIETY OF MEDIA PHOTOGRAPHERS, INC., GRAPHIC ARTISTS GUILD, PICTURE ARCHIVE COUNCIL OF AMERICA, INC., NORTH AMERICAN NATURE PHOTOGRAPHY ASSOCIATION, PROFESSIONAL PHOTOGRAPHERS OF AMERICA, LEIF SKOOGFORS, AL SATTERWHITE, MORTON BEEBE, ED KASHI, JOHN SCHMELZER, and SIMMS TABACK, on behalf of themselves and all others similarly situated,

Plaintiffs,

v.

GOOGLE INC.

Defendant.

Civil Action No. 10 Civ. 2977 (DC)

**ECF Case**

**DEFENDANT GOOGLE INC.'S  
NOTICE OF MOTION AND MOTION TO DISMISS**

PLEASE TAKE NOTICE that upon the accompanying (a) Memorandum of Law and (b) Request for Judicial Notice dated December 22, 2011 and the exhibits thereto, Defendant Google Inc. (“Google”) by its attorneys Durie Tangri LLP, will move this Court at such time as the Court may direct at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, Courtroom 15B, New York, New York, for an order granting Google Inc.’s Motion to Dismiss.

Dated: December 22, 2011

Respectfully submitted,

By: /s/ Joseph C. Gratz

Daralyn J. Durie (*pro hac vice*)

ddurie@durietangri.com

Joseph C. Gratz (*pro hac vice*)

jgratz@durietangri.com

DURIE TANGRI LLP

217 Leidesdorff Street

San Francisco, CA 94111

Telephone: 415-362-6666

Facsimile: 415-236-6300

Attorneys for Defendant GOOGLE INC.