Steven G. Lisa (Illinois Bar No. 6187348)
Jon E. Kappes (Ariz. State Bar # 024714)
LAW OFFICES OF STEVEN G. LISA, LTD.
stevelisa@patentit.com
jonkappes@patentit.com
55 West Monroe Street, Suite 3200
Chicago, IL 60603
Tel & Fax: (312) 752-4357

Victoria Curtin (Ariz. State Bar #010897)
VICTORIA GRUVER CURTIN, P.L.C.
14555 N. Scottsdale Rd., Ste. 160
Scottsdale, Arizona 85254
Victoria@vcurtin.com
Tel.: (480) 998-3547
Fax: (480) 596-7956
Attorneys for Plaintiff

**IN THE UNITED STATES DISTRICT COURT**
**DISTRICT OF ARIZONA**

| | |
|---|---|
| HELFERICH PATENT LICENSING, L.L.C., an Illinois Limited Liability Company,<br><br>Plaintiff,<br><br>vs.<br><br>PHOENIX NEWSPAPERS, INC., dba THE ARIZONA REPUBLIC, an Arizona Corporation,<br><br>Defendants. | No. 2:11-cv-02476-NVW<br><br>**NOTICE OF FILING MOTION TO TRANSFER RELATED CASE** |

Plaintiff hereby notifies the Court of filing a Motion to Transfer this case as related to an earlier filed action. (*See Exhibit A).*

///

///

Dated: December 15, 2011

VICTORIA GRUVER CURTIN, P.L.C.

By:*/s/ Victoria Curtin*

Victoria Gruver Curtin
14555 North Scottsdale Rd., Ste. 160
Scottsdale, Arizona 85254
Tel.: (480) 948-3295
Fax: (480) 948-3387

Attorney for Plaintiff

**CERTIFICATE OF SERVICE**

I hereby certify that on December 15, 2011, I electronically transmitted the attached document to the Clerks' Office using the Court's CM/ECF System for filing and a transmittal of a Notice of Electronic Filing was sent electronically to the following CM/ECF registrants:

*/s/ Laura Keller*
Laura Keller

# EXHIBIT A

Steven G. Lisa (Illinois Bar No. 6187348)
Jon E. Kappes (Ariz. State Bar # 024714)
LAW OFFICES OF STEVEN G. LISA, LTD.
stevelisa@patentit.com
jonkappes@patentit.com
55 West Monroe Street, Suite 3200
Chicago, IL 60603
Tel & Fax: (312) 752-4357

Victoria Curtin (Ariz. State Bar #010897)
VICTORIA GRUVER CURTIN, P.L.C.
14555 N. Scottsdale Rd., Ste. 160
Scottsdale, Arizona 85254
Victoria@vcurtin.com
Tel.: (480) 998-3547
Fax: (480) 596-7956
Attorneys for Plaintiff

**IN THE UNITED STATES DISTRICT COURT**
**DISTRICT OF ARIZONA**

| | |
|---|---|
| HELFERICH PATENT LICENSING, L.L.C., an Illinois Limited Liability Company,<br><br>Plaintiff,<br><br>vs.<br><br>SUNS LEGACY PARTNERS, LLC, dba PHOENIX SUNS, a Delaware Corporation,<br><br>Defendants. | No. 2:11-cv-02304<br><br>**MOTION TO TRANSFER RELATED CASE No. 2:11-cv-02476-NVW** |

Plaintiff Helferich Patent Licensing, LLC ("HPL") files this motion to transfer as a related case pursuant to Local Rule 42.1.a.

On December 14, 2011, HPL filed an action, *Helferich Patent Licensing, LLC v. Phoenix Newspapers Inc.*, No. 2:11-cv-02476-NVW in the district court for the District of Arizona. That action alleges infringement of the same patents at issue in this case: U.S. Patent Nos. 7,835,757, 7,499,716, and 7,280,838, relating to the provision of media

and content to cell phones using messages (such as SMS text messages) that include special identifiers (such as a URL link). Because the same patents are at issue, and the patents are alleged to be infringed by substantially the same activities, the same issues of claim construction, invalidity and infringement will be addressed in both cases. A substantial duplication of labor will occur if such related cases are heard by different judges. Further, HPL notes that both cases were filed within a short period of time of each other, and no substantive matters have been considered in either case.

For these reasons, HPL respectfully moves that the latter filed action be transferred to Judge Campbell as related to this earlier-filed action.

Dated: December 15, 2011

VICTORIA GRUVER CURTIN, P.L.C.

By:*/s/ Victoria Curtin*

Victoria Gruver Curtin
14555 North Scottsdale Rd., Ste. 160
Scottsdale, Arizona 85254
Tel.: (480) 948-3295
Fax: (480) 948-3387

Attorney for Plaintiff

**CERTIFICATE OF SERVICE**

I hereby certify that on December 15, 2011, I electronically transmitted the attached document to the Clerks' Office using the Court's CM/ECF System for filing and a transmittal of a Notice of Electronic Filing was sent electronically to the following CM/ECF registrants:

Donna H. Catalfio
catalfiod@ballardspahr.com
Ballard Spahr, LLP
1 East Washington Street, Suite 2300
Phoenix, AZ 85004-2555

*/s/ Laura Keller*
Laura Keller