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12 Attorneys for Plaintiffs Match Group, LLC;
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and People Media, Inc.
13

14 **UNITED STATES DISTRICT COURT**

15 **NORTHERN DISTRICT OF CALIFORNIA**

16 MATCH GROUP, LLC, a Delaware
corporation; HUMOR RAINBOW, INC., a
17 New York corporation; PLENTYOFFISH
MEDIA ULC, a Canadian corporation; and
18 PEOPLE MEDIA, INC., a Delaware
corporation,
19

20 Plaintiffs,

21 v.

22 GOOGLE LLC; GOOGLE IRELAND
LIMITED; GOOGLE COMMERCE
LIMITED; GOOGLE ASIA PACIFIC PTE.
23 LIMITED; and GOOGLE PAYMENT
CORP.,
24

25 Defendants.

Case No. 5:22-cv-02746

**PLAINTIFFS MATCH GROUP, LLC’S,
HUMOR RAINBOW, INC.’S,
PLENTYOFFISH MEDIA ULC’S, AND
PEOPLE MEDIA, INC.’S NOTICE OF
MOTION AND MOTION FOR TEMPORARY
RESTRAINING ORDER**

NOTICE OF MOTION AND MOTION FOR TEMPORARY RESTRAINING ORDER**TO ALL PARTIES HEREIN AND THEIR ATTORNEYS OF RECORD:**

PLEASE TAKE NOTICE that on May 19, 2022, or as soon thereafter as the matter may be heard, Plaintiffs Match Group, LLC; Humor Rainbow, Inc.; PlentyOfFish Media ULC; and People Media, Inc. (together, “Match Group”)¹ will and hereby do move this Court pursuant to Federal Rule of Civil Procedure 65 for a Temporary Restraining Order and an Order to Show Cause Why a Preliminary Injunction Should Not Issue to maintain the status quo and (1) restrain defendant Google LLC and its codefendants and their officers, employees, agents, and all persons acting in concert or participating with them (collectively, “Google”) from removing, de-listing, refusing to list or otherwise making unavailable any of the apps owned or operated by Match Group, including rejecting or refusing to distribute any update of any such app, from Google Play on the basis that the app permits users to make payments for in-app purchases without using Google Play Billing or on any pretextual basis and (2) restrain Google from requiring that Match Group’s apps offer Google Play Billing as the exclusive means of processing in-app purchases or otherwise require Match Group’s apps to change or eliminate the payment options offered to users.

This motion is made on the grounds (1) that absent a temporary restraining order granted without further notice, Match Group is likely to suffer irreparable harm; (2) that Match Group is likely to succeed on the merits of its claims, including that Google’s conduct (a) constitutes intentional interference with Match Group’s contracts, (b) violates California Unfair Competition Law, Bus. and Prof. Code §§ 17200 et seq., and (c) constitutes an illegal tie in violation of the Sherman and Cartwright Acts; (3) that the balance of equities tips sharply in Match Group’s favor because Google will suffer no harm from maintaining the status quo; and (4) that the public interest supports an injunction.

¹ The term “Match Group” includes only the operating entities named as Plaintiffs. Match Group LLC; Humor Rainbow, Inc.; PlentyofFish Media ULC; and People Media, Inc. are part of the Match Group family of companies with the ultimate parent company Match Group, Inc. (“MGI”), a nonoperating holding company. MGI’s other subsidiaries are not included in the definition of “Match Group” in this motion.

1 This motion is based upon the Complaint in this action, this Notice of Motion, the
2 Memorandum of Points and Authorities filed herewith, the Proposed Temporary Restraining Order
3 and Order to Show Cause Why a Preliminary Injunction Should Not Issue, the Declaration of Peter
4 Foster filed herewith along with its accompanying exhibits, the Declaration of Douglas Dixon, Epic
5 Games, Inc.'s recently filed Motion for a Preliminary Injunction and supporting papers in the related
6 matter of *Epic Games, Inc. v. Google LLC*, Case No. 3:20-cv-0561-JD at Dkt. Nos. 213-221, and all
7 matters with respect to which this Court may take judicial notice and such oral and documentary
8 evidence as may be presented to the Court.

9 The undersigned counsel for Match Group have notified Google and its counsel of Match
10 Group's intention to bring this Motion before this Court. *See* Declaration of Douglas Dixon.

11
12 Dated: May 10, 2022

Respectfully submitted,

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14 By: 
15 _____
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