IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

LIVEPERSON, INC., Plaintiff, v. NEXTCARD, LLC and MARSHALL CREDIT STRATEGIES, LLC, Defendants.	Civil Action No. 08-062 (GMS)

PLAINTIFF LIVEPERSON, INC.'S MOTION FOR TARGETED JURISDICTIONAL DISCOVERY

Plaintiff LivePerson Inc. ("LivePerson") hereby moves the Court for an order granting leave to conduct targeted jurisdictional discovery on personal jurisdiction issues in this action. The reasons for this motion are fully set forth in LivePerson's Brief In Opposition To Defendants Nextcard, LLC & Marshall Credit Strategies, LLC's Motions To Dismiss And, In The Alternative, Brief In Support Of Its Motion For Targeted Jurisdictional Discovery.

Pursuant to Rule 7.1.1 of the Local Rules of the United States District Court for District of Delaware, undersigned counsel certifies that counsel for LivePerson has made a reasonable effort to reach agreement with counsel for Defendants on the matters set forth in this motion, and that the parties have not been able to reach agreement.

WHEREFORE, Plaintiff LivePerson respectfully requests that the Court grant LivePerson's Motion for Targeted Jurisdictional Discovery.

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Dated: May 8, 2008

* Admission *pro hac vice* pending.

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ORDER

Having considered Plaintiff LivePerson Inc.'s Motion for Targeted Jurisdictional Discovery, IT IS HEREBY ORDERED that:

1. LivePerson's Motion for Targeted Jurisdictional Discovery is GRANTED.

2. LivePerson is permitted to conduct discovery limited to the issue of the Court's jurisdiction over Defendants.

3. Such discovery shall be completed by _____, 2008.

Dated: _____, 2008

_____
CHIEF UNITED STATES DISTRICT JUDGE

CERTIFICATE OF SERVICE

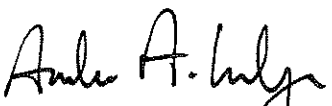
I, Melanie K. Sharp, Esquire, hereby certify that on May 8, 2008, I caused to be electronically filed a true and correct copy of Plaintiff LivePerson Inc.'s Motion for Targeted Jurisdictional Discovery with the Clerk of the Court using CM/ECF, which will send notification that such filing is available for viewing and downloading to the following counsel of record:

David L. Finger, Esquire
Finger & Slanina, LLC
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I further certify that on May 8, 2008, I caused a copy of the foregoing document, to be served by hand delivery on the above-listed counsel of record and on the following non-registered participants in the manner indicated.

BY E-MAIL (by agreement of counsel):

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