



Pursuant to Rule 23(b)(3) of the Federal Rules of Civil Procedure, Proposed Class Representatives John S. Anderson, the Leisinger Pension Fund, Lance B. Orr, R. Warren Ross, Mark Weiss, Marilyn D. Egel, Joseph Wilenkin and Sharon Tsai (collectively, the “Proposed Class Representatives”), by and through their counsel, respectfully move for an order: (1) certifying this action as a class action, (2) certifying a class (the “Class”) consisting of all purchasers of priceline.com securities from January 27, 2000 to October 4, 2000, inclusive (the “Class Period”), and (3) appointing the Proposed Class Representatives as Class Representatives of the defined class. In support of this motion, the Proposed Class Representatives submit a memorandum of law in support of their motion for class certification currently herewith.

Dated: January 7, 2005

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on January 7, 2005, a true copy of the foregoing was served on all counsel of record on the attached service list by first-class, postage prepaid U.S. mail.

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