

1 [Counsel Signatures Appear at the End]

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UNITED STATES DISTRICT COURT

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NORTHERN DISTRICT OF CALIFORNIA

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SAN FRANCISCO DIVISION

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ORACLE AMERICA, INC.

Case No. CV 10-03561 WHA

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Plaintiff,

**PARTIES' JOINT ADMINISTRATIVE
REQUEST TO FILE DOCUMENTS
UNDER SEAL**

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v.

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GOOGLE INC.

Dept.: Courtroom 8, 19th Floor
Judge: Honorable William H. Alsup

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Defendant.

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1 Plaintiff Oracle America, Inc. (“Oracle”) hereby requests permission to file the following
2 documents under seal pursuant to Federal Rule of Court Civil Procedure 26(c) and Civil Local
3 Rules 3-17(d), 7-11, and 79-5:
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5 1. Exhibit 16 to the Declaration of Daniel Purcell in Support of Google, Inc.’s
6 Motions in Limine.

7 2. Exhibit 18 to the Declaration of Daniel Purcell in Support of Google, Inc.’s
8 Motions in Limine.

9 3. Exhibit 19 to the Declaration of Daniel Purcell in Support of Google, Inc.’s
10 Motions in Limine.

11 4. Exhibit 3-9 to the Declaration of Ruchika Agrawal in Support of Oracle America,
12 Inc.’s Opposition to Google’s Motions in Limine Nos. 1 through 5.

13 5. Exhibit 3-10 to the Declaration of Ruchika Agrawal in Support of Oracle America,
14 Inc.’s Opposition to Google’s Motions in Limine Nos. 1 through 5.

15 6. The portions of Oracle’s Opposition to Google’s Motion in Limine No. 3
16 containing the above information.

17 7. The portions of Google’s Motion in Limine No. 3 containing the above
18 information.
19

20 The documents listed above contain information that has been designated by Plaintiff
21 Oracle America, Inc. (“Oracle”) as Confidential or Highly Confidential – Attorneys’ Eyes Only
22 pursuant to the Order Approving Stipulated Protective Order Subject to Stated Conditions entered
23 in this case. (Dkt. No. 68.) Google, Inc. (“Google”) states no position as to whether disclosure of
24 materials marked by Oracle as Confidential or Highly Confidential – Attorneys’ Eyes Only
25 material would cause harm to Oracle, and would not oppose an order requiring Oracle to make
26 that information public. Plaintiff submits herewith the Declaration of Daniel P. Muino in Support
27 of Plaintiff’s Administrative Request to File Under Seal.
28

1 Defendant Google hereby requests permission to file the following documents under seal
2 pursuant to Federal Rule of Court Civil Procedure 26(c) and Civil Local Rules 3-17(d), 7-11, and
3 79-5:

4
5 1. Exhibit E to the Declaration of Daniel Muino in Support of Oracle America, Inc.'s
6 Motions in Limine 1 through 5.

7 2. Exhibit F to the Declaration of Daniel Muino in Support of Oracle America, Inc.'s
8 Motions in Limine 1 through 5.

9 3. Exhibit K to the Declaration of Daniel Muino in Support of Oracle America, Inc.'s
10 Motions in Limine 1 through 5.

11 4. Exhibit N to the Declaration of Daniel Muino in Support of Oracle America, Inc.'s
12 Motions in Limine 1 through 5.

13 5. Exhibit P to the Declaration of Daniel Muino in Support of Oracle America, Inc.'s
14 Motions in Limine 1 through 5.

15 6. Exhibit Q to the Declaration of Daniel Muino in Support of Oracle America, Inc.'s
16 Motions in Limine 1 through 5.

17 7. Exhibit 1-1 to the Declaration of Ruchika Agrawal in Support of Oracle America,
18 Inc.'s Opposition to Google's Motions in Limine Nos. 1 through 5.

19 8. Exhibit 1-2 to the Declaration of Ruchika Agrawal in Support of Oracle America,
20 Inc.'s Opposition to Google's Motions in Limine Nos. 1 through 5.

21 9. Exhibit 1-3 to the Declaration of Ruchika Agrawal in Support of Oracle America,
22 Inc.'s Opposition to Google's Motions in Limine Nos. 1 through 5.

23 10. Exhibit 1-4 to the Declaration of Ruchika Agrawal in Support of Oracle America,
24 Inc.'s Opposition to Google's Motions in Limine Nos. 1 through 5.

25 11. Exhibit 1-5 to the Declaration of Ruchika Agrawal in Support of Oracle America,
26 Inc.'s Opposition to Google's Motions in Limine Nos. 1 through 5.

27 12. Exhibit 1-6 to the Declaration of Ruchika Agrawal in Support of Oracle America,
28 Inc.'s Opposition to Google's Motions in Limine Nos. 1 through 5.

1 13. Exhibit 1-7 to the Declaration of Ruchika Agrawal in Support of Oracle America,
2 Inc.'s Opposition to Google's Motions in Limine Nos. 1 through 5.

3 14. Exhibit 1-8 to the Declaration of Ruchika Agrawal in Support of Oracle America,
4 Inc.'s Opposition to Google's Motions in Limine Nos. 1 through 5.

5 15. Exhibit 1-9 to the Declaration of Ruchika Agrawal in Support of Oracle America,
6 Inc.'s Opposition to Google's Motions in Limine Nos. 1 through 5.

7 16. Exhibit 1-10 to the Declaration of Ruchika Agrawal in Support of Oracle America,
8 Inc.'s Opposition to Google's Motions in Limine Nos. 1 through 5.

9 17. Exhibit 2-3 to the Declaration of Ruchika Agrawal in Support of Oracle America,
10 Inc.'s Opposition to Google's Motions in Limine Nos. 1 through 5.

11 18. Exhibit 2-4 to the Declaration of Ruchika Agrawal in Support of Oracle America,
12 Inc.'s Opposition to Google's Motions in Limine Nos. 1 through 5.

13 19. Exhibit 2-5 to the Declaration of Ruchika Agrawal in Support of Oracle America,
14 Inc.'s Opposition to Google's Motions in Limine Nos. 1 through 5.

15 20. Exhibit 2-14 to the Declaration of Ruchika Agrawal in Support of Oracle America,
16 Inc.'s Opposition to Google's Motions in Limine Nos. 1 through 5.

17 21. Exhibit 2-15 to the Declaration of Ruchika Agrawal in Support of Oracle America,
18 Inc.'s Opposition to Google's Motions in Limine Nos. 1 through 5.

19 22. Exhibit 2-16 to the Declaration of Ruchika Agrawal in Support of Oracle America,
20 Inc.'s Opposition to Google's Motions in Limine Nos. 1 through 5.

21 23. Exhibit 3-4 to the Declaration of Ruchika Agrawal in Support of Oracle America,
22 Inc.'s Opposition to Google's Motions in Limine Nos. 1 through 5.

23 24. Exhibit 3-6 to the Declaration of Ruchika Agrawal in Support of Oracle America,
24 Inc.'s Opposition to Google's Motions in Limine Nos. 1 through 5.

25 25. Exhibit 3-7 to the Declaration of Ruchika Agrawal in Support of Oracle America,
26 Inc.'s Opposition to Google's Motions in Limine Nos. 1 through 5.

27 26. Exhibit 3-8 to the Declaration of Ruchika Agrawal in Support of Oracle America,
28 Inc.'s Opposition to Google's Motions in Limine Nos. 1 through 5.

1 27. Exhibit 5-4 to the Declaration of Ruchika Agrawal in Support of Oracle America,
2 Inc.'s Opposition to Google's Motions in Limine Nos. 1 through 5.

3 28. Exhibit 10 to the Declaration of Daniel Purcell in Support of Google, Inc.'s
4 Motions in Limine.

5 29. Exhibit 15 to the Declaration of Daniel Purcell in Support of Google, Inc.'s
6 Motions in Limine.

7 30. Exhibit 16 to the Declaration of Daniel Purcell in Support of Google, Inc.'s
8 Motions in Limine.

9 31. Exhibit 30 to the Declaration of Daniel Purcell in Support of Google, Inc.'s
10 Motions in Limine.

11 32. Exhibit 32 to the Declaration of Daniel Purcell in Support of Google, Inc.'s
12 Motions in Limine

13 33. The portions of Oracle's Motion in Limine 2 containing the above information.

14 34. The portions of Oracle's Motion in Limine 3 containing the above information.

15 35. The portions of Oracle's Motion in Limine 4 containing the above information.

16 36. The portions of Oracle's Motion in Limine 5 containing the above information.

17 37. The portions of Oracle's Opposition to Google's Motion in Limine 1 containing
18 the above information.

19 38. The portions of Oracle's Opposition to Google's Motion in Limine 2 containing
20 the above information.

21 39. The portions of Oracle's Opposition to Google's Motion in Limine 3 containing
22 the above information.

23 40. The portions of Oracle's Opposition to Google's Motion in Limine 4 containing
24 the above information.

25 41. The portions of Oracle's Opposition to Google's Motion in Limine 5 containing
26 the above information.

27 42. The portions of Google's Motion in Limine 3 containing the above information.

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1 The documents listed above contain information that has been designated by Defendant
2 Google as Confidential or Highly Confidential – Attorneys’ Eyes Only pursuant to the Order
3 Approving Stipulated Protective Order Subject to Stated Conditions entered in this case. (Dkt.
4 No. 68.) Oracle states no position as to whether disclosure of materials marked by Google as
5 Confidential or Highly Confidential – Attorneys’ Eyes Only material would cause harm to
6 Google, and would not oppose an order requiring Google to make that information public.

7 Defendant submits herewith the Declaration of Reid Mullan in Support of Plaintiff’s
8 Administrative Request to File Under Seal.

9
10 The documents listed below contain information that has been designated by Motorola,
11 Inc. (“Motorola”) as Confidential or Highly Confidential – Attorneys’ Eyes Only pursuant to the
12 Order Approving Stipulated Protective Order Subject to Stated Conditions entered in this case.
13 (Dkt. No. 68.):

14
15 1. Exhibit 5-4 to the Declaration of Ruchika Agrawal in Support of Oracle America,
16 Inc.’s Opposition to Google’s Motions in Limine Nos. 1 through 5.

17 2. The portions of Oracle’s Opposition to Google’s Motion in Limine No. 5
18 containing the above information.

19
20 Oracle states no position as to whether disclosure of materials marked by Motorola as
21 Confidential or Highly Confidential – Attorneys’ Eyes Only material would cause harm to
22 Motorola, and would not oppose an order requiring Motorola to make that information public.

23 Motorola will be notified that, pursuant to Civil Local rule 79-5(d), it must file a
24 declaration supporting the sealability of the above-listed documents and a proposed sealing order.

1 Dated: October 7, 2011

MORRISON & FOERSTER LLP

2
3 By: /s/ Daniel P. Muino
Daniel P. Muino

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24 *Attorneys for Plaintiff*
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1 Dated: October 7, 2011

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