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16 Attorneys for Defendant Google Inc.

lodged proposed order

2009 MAY -7 PM 1:27
CLERK U.S. DISTRICT COURT
CENTRAL DIST. OF CALIF.
LOS ANGELES

FILED

11 UNITED STATES DISTRICT COURT
12 CENTRAL DISTRICT OF CALIFORNIA

13 PERFECT 10, INC., a California
14 corporation,

15 Plaintiff,

16 vs.

17 GOOGLE INC., a corporation; and
18 DOES 1 through 100, inclusive,

19 Defendants.

CASE NO. CV 04-9484 AHM (SHx)
[Consolidated with Case No. CV 05-
4753 AHM (SHx)]

DISCOVERY MATTER

**GOOGLE INC.'S APPLICATION
TO FILE UNDER SEAL PORTIONS
OF THE JOINT STIPULATION RE.
GOOGLE'S MOTION TO COMPEL
PERFECT 10 (1) TO PRODUCE
DOCUMENTS, (2) TO COMPLY
WITH PROTECTIVE ORDER, AND
(3) TO AFFIX DOCUMENT
CONTROL NUMBERS TO ITS
DOCUMENT PRODUCTION AND
PORTIONS OF THE
DECLARATION OF RACHEL
HERRICK KASSABIAN IN
SUPPORT THEREOF**

Hon. Stephen J. Hillman

Courtroom: 550
Hearing Date: June 1, 2009
Hearing Time: 2:00 pm

Discovery Cutoff: None Set
Pretrial Conference Date: None Set
Trial Date: None Set

19 AND COUNTERCLAIM

20 PERFECT 10, INC., a California
21 corporation,

22 Plaintiff,

23 vs.

24 AMAZON.COM, INC., a corporation;
25 A9.COM, INC., a corporation; and
26 DOES 1 through 100, inclusive,

27 Defendants.

ORIGINAL

1 Pursuant to Local Rule 79-5.1, the Procedures and Schedules of the
2 Honorable Stephen J. Hillman at Paragraph 17, and the Protective Order entered by
3 the Court in this action (Docket No. 94), Google Inc. ("Google") hereby submits this
4 application to file under seal the redacted portions of the Joint Stipulation re. Google
5 Inc.'s Motion to Compel Perfect 10 (1) to Produce Documents, (2) to Comply with
6 the Protective Order, and (3) to Affix Document Control Numbers to Its Document
7 Production, and the redacted portions of the Declaration of Rachel Herrick
8 Kassabian in support thereof (the "Confidential Materials").

9 The Confidential Materials include materials that Perfect 10, Inc. has
10 designated "Confidential" and/or "Highly Confidential" pursuant to the Protective
11 Order. Accordingly, Google requests that the Confidential Materials be filed under
12 seal.

13
14 DATED: May 6, 2009

QUINN EMANUEL URQUHART OLIVER &
HEDGES, LLP

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16 By /s/ Rachel Herrick Kassabian
17 Rachel Herrick Kassabian
Attorneys for Defendant Google Inc.
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