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16 Attorneys for Defendant Google Inc.

lodged proposed order

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CLERK U.S. DISTRICT COURT
CENTRAL DIST. OF CALIF.
LOS ANGELES

FILED

10 UNITED STATES DISTRICT COURT
11 CENTRAL DISTRICT OF CALIFORNIA

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

14 Plaintiff,

15 vs.

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

18 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**

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
DOES 1 through 100, inclusive,

26 Defendants.

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

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

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.

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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
18 Attorneys for Defendant Google Inc.
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