

lodged proposed order

2009 AUG 10 AM 10:11

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

FILED

Jeffrey N. Mausner (State Bar No. 122385)
Law Offices of Jeffrey N. Mausner
Warner Center Towers
21800 Oxnard Street, Suite 910
Woodland Hills, California 91367-3640
Email: Jeff@mausnerlaw.com
Telephone: (310) 617-8100, (818) 992-7500
Facsimile: (818) 716-2773

Attorneys for Plaintiff Perfect 10, Inc.

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

PERFECT 10, INC., a California
corporation,

Plaintiff,

v.

GOOGLE, INC., a corporation; et al.,

Defendants.

AND CONSOLIDATED CASE.

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

**APPLICATION TO FILE UNDER
SEAL DOCUMENTS SUBMITTED IN
OPPOSITION TO GOOGLE'S THREE
MOTIONS FOR SUMMARY
JUDGMENT RE DMCA SAFE
HARBOR FOR ITS WEB AND IMAGE
SEARCH, BLOGGER SERVICE, AND
CACHING FEATURE (DOCKET NOS.
428, 427, and 426)**

BEFORE JUDGE A. HOWARD MATZ

Date: None Set for Application to File
Under Seal

Time: None Set

Place: Courtroom 14, Courtroom of the
Honorable A. Howard Matz

Discovery Cut-Off Date: None Set

Pretrial Conference Date: None Set

Trial Date: None Set

Application To File Under Seal

1 Pursuant to Local Rule 79-5.1, the Order of Judge Matz re Protective Orders
2 and Treatment of Confidential Information at Section I.D, and the Protective Order
3 dated December 27, 2005 (Docket No. 94) entered by the Court, Perfect 10, Inc.
4 hereby submits this application to file under seal the following documents:

- 5 1) **PLAINTIFF PERFECT 10, INC.'S OPPOSITION TO**
6 **GOOGLE'S MOTION FOR SUMMARY JUDGMENT RE:**
7 **SAFE HARBOR UNDER 17 U.S.C. §512(c) FOR ITS BLOGGER**
8 **SERVICE**
- 9 2) **PLAINTIFF PERFECT 10, INC.'S OPPOSITION TO**
10 **GOOGLE'S MOTION FOR SUMMARY JUDGMENT RE:**
11 **SAFE HARBOR UNDER 17 U.S.C. §512(d) FOR WEB AND**
12 **IMAGE SEARCH**
- 13 3) **PLAINTIFF PERFECT 10, INC.'S OPPOSITION TO**
14 **GOOGLE'S MOTION FOR SUMMARY JUDGMENT RE:**
15 **SAFE HARBOR UNDER 17 U.S.C. §512(b) FOR ITS CACHING**
16 **FEATURE**
- 17 4) **PERFECT 10'S STATEMENT OF GENUINE ISSUES IN**
18 **OPPOSITION TO GOOGLE'S MOTION FOR SUMMARY**
19 **JUDGMENT RE: SAFE HARBOR UNDER 17 U.S.C. § 512(c)**
20 **FOR ITS BLOGGER SERVICE**
- 21 5) **PERFECT 10'S STATEMENT OF GENUINE ISSUES IN**
22 **OPPOSITION TO GOOGLE'S MOTION FOR SUMMARY**
23 **JUDGMENT RE: SAFE HARBOR UNDER 17 U.S.C. § 512(d)**
24 **FOR WEB AND IMAGE SEARCH**
- 25 6) **PERFECT 10'S STATEMENT OF GENUINE ISSUES IN**
26 **OPPOSITION TO GOOGLE'S MOTION FOR SUMMARY**
27 **JUDGMENT RE: SAFE HARBOR UNDER 17 U.S.C. § 512(b)**
28 **FOR ITS CACHING FEATURE**
- 7) **DECLARATION OF DR. NORMAN ZADA SUBMITTED IN**
OPPOSITION TO GOOGLE'S THREE MOTIONS FOR
SUMMARY JUDGMENT RE DMCA SAFE HARBOR FOR ITS
WEB AND IMAGE SEARCH, BLOGGER SERVICE, AND
CACHING FEATURE (DOCKET NOS. 428, 427, AND 426)
(INCLUDING EXHIBITS 1-26, AND EXHIBITS 27-57)
- 8) **EXHIBIT 9, A DISK, TO THE DECLARATION OF DR.**
NORMAN ZADA SUBMITTED IN OPPOSITION TO
GOOGLE'S THREE MOTIONS FOR SUMMARY JUDGMENT
RE DMCA SAFE HARBOR FOR ITS WEB AND IMAGE

9) **EXHIBITS G, H, K, N, AND P TO THE DECLARATION OF JEFFREY N. MAUSNER SUBMITTED IN OPPOSITION TO GOOGLE'S THREE MOTIONS FOR SUMMARY JUDGMENT RE DMCA SAFE HARBOR FOR ITS WEB AND IMAGE SEARCH, BLOGGER SERVICE, AND CACHING FEATURE (DOCKET NOS. 428, 427, AND 426)**

Dated: August 9, 2009

By: Jeffrey N. Mausner
Jeffrey N. Mausner
Attorneys for Plaintiff Perfect 10, Inc.