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Attorneys for Defendant GOOGLE INC.

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

PERFECT 10, INC., a California  
corporation,

Plaintiff,

vs.

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

Defendants.

AND COUNTERCLAIM

PERFECT 10, INC., a California  
corporation,

Plaintiff,

vs.

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

Defendants.

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

**GOOGLE INC.'S APPLICATION  
TO FILE UNDER SEAL  
GOOGLE'S RESPONSES AND  
OBJECTIONS TO PERFECT 10,  
INC.'S RESPONSES AND  
OBJECTIONS TO GOOGLE'S  
EVIDENCE IN SUPPORT OF ITS  
MOTIONS FOR SUMMARY  
JUDGMENT RE: SAFE HARBORS  
UNDER 17 U.S.C. § 512**

Hon. A. Howard Matz

Date: None Set (taken under  
submission)

Time: None Set

Place: Courtroom 14

Discovery Cut-off: None Set

Pre-trial Conference: None Set

Trial Date: None Set

*Lodged Proposed  
Order*  
2009 NOV 24 PM 4:02  
U.S. DISTRICT COURT  
CENTRAL DISTRICT OF CALIF.  
LOS ANGELES  
MAD

FILED

1 Pursuant to Local Rule 79-5.1, the Order of the Hon. A. Howard Matz re.  
2 Protective Orders and Treatment of Confidential Information at Section I.D, and the  
3 Protective Order entered by the Court in this action (Docket No. 94), Google Inc.  
4 (“Google”) hereby submits this application to file under seal the following  
5 documents (the “Confidential Materials”):

- 6  
7 • DEFENDANT GOOGLE INC.'S RESPONSE TO PERFECT 10,  
8 INC.'S EVIDENTIARY OBJECTIONS TO THE DECLARATION  
9 AND REBUTTAL DECLARATION OF BILL BROUGHER;  
10
- 11 • DEFENDANT GOOGLE INC.'S RESPONSE TO PERFECT 10,  
12 INC.'S EVIDENTIARY OBJECTIONS TO THE DECLARATION OF  
13 PAUL HAAHR;  
14
- 15 • DEFENDANT GOOGLE INC.'S RESPONSE TO PERFECT 10,  
16 INC.'S EVIDENTIARY OBJECTIONS TO THE DECLARATION  
17 AND REBUTTAL DECLARATION OF SHANTAL RANDS  
18 POOVALA; and  
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- 20 • DEFENDANT GOOGLE INC.'S EVIDENTIARY OBJECTIONS TO  
21 THE DECLARATION OF DR. NORMAN ZADA FILED IN  
22 FURTHER OPPOSITION TO GOOGLE’S MOTIONS FOR  
23 SUMMARY JUDGMENT REGARDING ENTITLEMENT TO  
24 DMCA SAFE HARBOR.  
25

26 The Confidential Materials include materials that Perfect 10, Inc. and/or  
27 Google has designated “Confidential” and/or “Highly Confidential” pursuant to the  
28

1 Protective Order. Accordingly, Google requests that the Confidential Materials be  
2 filed under seal.

3  
4 DATED: November 23, 2009

Respectfully submitted,

5 QUINN EMANUEL URQUHART OLIVER &  
6 HEDGES, LLP

7  
8 By *Rachel Herrick Kassabian*  
9 Rachel Herrick Kassabian  
10 Attorneys for Defendant GOOGLE INC.  
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