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Attorneys for Plaintiff Perfect 10, Inc.

Proposed order lodged
BY *[Signature]*
CLERK, U.S. DISTRICT COURT
CENTRAL DIST. OF CALIF.
LOS ANGELES
2009 NOV 30 AM 11:01

FILED

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)

Before Judge A. Howard Matz

**APPLICATION TO FILE
DOCUMENTS UNDER SEAL IN
SUPPORT OF PLAINTIFF
PERFECT 10, INC.'S MOTION FOR
EVIDENTIARY AND OTHER
SANCTIONS AGAINST
DEFENDANT GOOGLE INC.
AND/OR FOR THE APPOINTMENT
OF A SPECIAL MASTER**

Date: None Set
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 the Hon. A. Howard Matz re
2 Protective Orders and Treatment of Confidential Information at Section I.D, the
3 Procedures and Schedules of the Hon. Stephen J. Hillman at Paragraph 17, and the
4 Protective Order dated December 27, 2005 (Docket No. 94) entered by the Court,
5 Plaintiff Perfect 10, Inc. hereby submits this application to file under seal the
6 following documents:

7 1) **MEMORANDUM OF POINTS AND AUTHORITIES IN**
8 **SUPPORT OF MOTION OF PLAINTIFF PERFECT 10, INC. FOR**
9 **EVIDENTIARY AND OTHER SANCTIONS AGAINST DEFENDANT**
10 **GOOGLE INC. AND/OR FOR THE APPOINTMENT OF A SPECIAL**
11 **MASTER, FILED UNDER SEAL PURSUANT TO PROTECTIVE ORDER;**

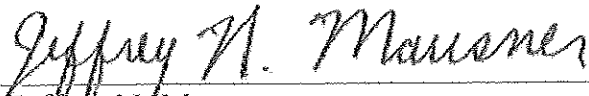
12 2) **DECLARATION OF DR. NORMAN ZADA IN SUPPORT OF**
13 **PERFECT 10'S MOTION FOR EVIDENTIARY AND OTHER SANCTIONS**
14 **AGAINST GOOGLE, AND/OR FOR THE APPOINTMENT OF A SPECIAL**
15 **MASTER, FILED UNDER SEAL PURSUANT TO PROTECTIVE ORDER; &**

16 3) **EXHIBIT 9 (A DISK) TO THE DECLARATION OF DR.**
17 **NORMAN ZADA IN SUPPORT OF PERFECT 10'S MOTION FOR**
18 **EVIDENTIARY AND OTHER SANCTIONS AGAINST GOOGLE, AND/OR**
19 **FOR THE APPOINTMENT OF A SPECIAL MASTER [DISK ATTACHED],**
20 **FILED UNDER SEAL PURSUANT TO PROTECTIVE ORDER.**

21 The documents and disk contain material designated Confidential and Highly
22 Confidential by Defendant Google Inc. and material designated Confidential by
23 third-party Motion Picture Association of America (MPAA). Plaintiff Perfect 10,
24 Inc. respectfully requests that the above-entitled documents, which have been
25 lodged, be filed under seal.

26 Dated: November 29, 2009

27 Respectfully submitted,
28 LAW OFFICES OF JEFFREY N. MAUSNER

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