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lodged proposed order

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

**DEFENDANT GOOGLE INC.'S
APPLICATION TO FILE
DOCUMENTS UNDER SEAL**

Hon. Stephen J. Hillman

Date: January 15, 2010

Time: 10:00 a.m.

Crtrm.: 550

20 AND COUNTERCLAIM

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

23 Plaintiff,

24 vs.

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

28 Defendants.

Discovery Cut-off: None Set
Pretrial Conference Date: None Set
Trial Date: None Set

ORIGINAL

1 Pursuant to Local Rule 79-5.1, the Procedures and Schedules of the Hon.
2 Stephen J. Hillman at ¶ 17, and the Protective Order entered by the Court in this
3 action (Docket No. 94), Google Inc. hereby submits this application to file under
4 seal the following documents (the “Confidential Materials”):

- 5 • GOOGLE INC.'S EVIDENTIARY OBJECTIONS TO THE
6 DECLARATION OF MARK MCDEVITT SUBMITTED IN
7 SUPPORT OF PERFECT 10, INC.'S MOTION FOR EVIDENTIARY
8 AND OTHER SANCTIONS; and
- 9 • GOOGLE INC.'S RESPONSE TO PERFECT 10, INC.'S
10 EVIDENTIARY OBJECTIONS TO THE DECLARATION OF KRIS
11 BREWER.

12 The Confidential Materials include materials that Perfect 10, Inc., Google
13 Inc., and/or third parties have designated “Confidential” and/or “Highly
14 Confidential” pursuant to the Protective Order. Accordingly, Google requests that
15 the Confidential Materials be filed under seal.

16
17 DATED: January 13, 2010

Respectfully submitted,

18 QUINN EMANUEL URQUHART OLIVER &
19 HEDGES, LLP

20
21 By *Rachel Herrick Kassabian*
22 Rachel Herrick Kassabian
23 Attorneys for Defendant GOOGLE INC.
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