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 8 PLAYER AUCTION, LLC

10 UNITED STATES DISTRICT COURT
 11 CENTRAL DISTRICT OF CALIFORNIA

13 ZYNGA GAME NETWORK INC., a)) Case No. CV: 10-2576 CBM (JCx)
14 Delaware Corporation,) First Amended Complaint Filed:
) September 8, 2010
15 Plaintiff,) Honorable Jacqueline Chooljian
16)
17 v.)
)
18 PLAYER AUCTIONS LLC, a) JOINT STIPULATION RE:
19 limited liability company) [PROPOSED] PROTECTIVE
) ORDER
20 Defendant.)
21 _____)

24 **TO THE HONORABLE COURT:**

26 The Parties to this action, by and through their attorneys of record, submit the

28 **JOINT STIPULATION RE: [PROPOSED] PROTECTIVE ORDER**

1 Attached [Proposed] Protective Order, for entry by the Court. The Parties contend good
2 cause exists for entry of this Order, for the reasons set forth below:
3

4 This action involves claims of copyright infringement, trademark infringement
5 and unfair competition against Defendant, PLAYER AUCTIONS, LLC (“Defendant”).
6 operator of a website with the internet domain name PLAYERAUCTIONS.COM. In
7 connection with its claims, Plaintiff ZYNGA GAME NETWORK, INC., now known as
8 Zynga Inc. (“Plaintiff”) has sought from Defendant the discovery of documents and
9 information that Defendant contends may be particularly sensitive, confidential and/or
10 proprietary, including sales records, item profitability reports, pricing methods,
11 financial information and the like. Defendant contends this information is not
12 ordinarily available to the public and requires special protection from disclosure
13 pursuant to F.R.C.P. 26(c).
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18 WHEREAS Plaintiff anticipates that Defendant may seek discovery of
19 documents and information that may be particularly sensitive, confidential and/or
20 proprietary.
21

22 WHEREAS Plaintiff and Defendant having stipulated to the following provisions
23 herein and having requested that the Court issue a protective order pursuant to Fed. R.
24 Civ. P. 26(c) to protect the confidentiality of confidential, competitively sensitive
25 and/or proprietary information, that may need to be disclosed to adversary parties in
26 connection with discovery in this case; and
27
28

1 WHEREAS the parties have further consented to the form of this Order and
2 stipulated that good cause exists for issuance of an appropriately tailored confidentiality
3 order governing the pretrial phase of this action;
4

5 The Parties respectfully request the Court enter the [Proposed] Protective Order
6 in the form filed concurrently herewith.
7

8 RESPECTFULLY SUBMITTED.

9 Dated: April 11, 2011

DYKEMA GOSSETT LLP

10
11
12 By: /s/ Brian H. Newman
13 Brian H. Newman
14 Attorney for Defendant
 PLAYER AUCTIONS, LLC

15 Dated: April 11, 2011

KEATS, MCFARLAND & WILSON, LLP

16
17 By: /s/ David K. Caplan (with permission)
18 David K. Caplan
19 Attorney for Plaintiff
20 ZYNGA INC., formerly known as
 ZYNGA GAME NETWORK INC.

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