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15 UNITED STATES DISTRICT COURT
 16 NORTHERN DISTRICT OF CALIFORNIA
 17 SAN FRANCISCO DIVISION

19 OVERTURE SERVICES, INC., a Delaware
 20 corporation,

21 Plaintiff,

22 v.

23 GOOGLE INC., a California corporation,

24 Defendant.

Case No. C 02-01991 CRB ADR

**JOINT MOTION FOR ENTRY OF
 STIPULATED SUPPLEMENTAL
 PROTECTIVE ORDER RE OUTSIDE
 COUNSEL ONLY SOURCE CODE**

Judge: Hon. Charles R. Breyer

26 Plaintiff Overture Services, Inc. (“Overture”), and defendant Google Inc. (“Google”)
 27 jointly move pursuant to Rule 26(c)(7) of the Federal Rules of Civil Procedure for entry of a
 28 supplemental protective order regarding “Outside Counsel Only” source code. The proposed

1 order, to which the parties stipulate, is attached hereto as an exhibit.

2 The Court has previously entered a stipulated protective order generally governing the
3 disclosure of confidential information in this case. That order contemplated the entry of a further
4 order addressing issues specific to source code designated Outside Counsel Only. The parties to
5 this action believe that the conduct of this matter requires disclosure of highly proprietary source
6 code. Due to the extremely sensitive nature of this material, and to ensure that no unfair
7 advantage is gained by a party through disclosure or use of such information, Overture and
8 Google jointly move for and request entry of the attached order.

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10 Dated: January 8, 2003

BRINKS HOFER GILSON & LIONE

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13 By: /s/ Charles M. McMahon
14 CHARLES M. MCMAHON
Attorneys for Plaintiff
OVERTURE SERVICES, INC.

15 Dated: January 8, 2003

KEKER & VAN NEST, LLP

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18 By: /s/ Michael S. Kwun
19 MICHAEL S. KWUN
Attorneys for Defendant
GOOGLE INC.

20 I hereby attest that concurrence in the filing of this document has been obtained from
21 Charles M. McMahon.

22 Dated: January 8, 2003

KEKER & VAN NEST, LLP

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25 By: /s/ Michael S. Kwun
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Attorneys for Defendant
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