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12
 13 UNITED STATES DISTRICT COURT
 14 NORTHERN DISTRICT OF CALIFORNIA

15 ACCO BRANDS, INC. d/b/a
 16 KENSINGTON TECHNOLOGY GROUP,

17 Plaintiff,

18 v.

19 PC GUARDIAN ANTI-THEFT
 20 PRODUCTS, INC. and FELLOWES, INC.,

21 Defendants.

No. 04-03526 SI

22 **STIPULATION TO FILE MATERIALS**
 23 **UNDER SEAL IN CONNECTION WITH**
 24 **DEFENDANTS’ OPPOSITION TO**
 25 **PLAINTIFF KENSINGTON**
 26 **TECHNOLOGY GROUP’S MOTION**
 27 **FOR SUMMARY JUDGMENT**

28 Plaintiff ACCO Brands, Inc. d/b/a/ Kensington Technology Group (“ACCO”) and
 defendants PC Guardian Anti-Theft Products, Inc. (“PC Guardian”) and Fellowes, Inc. hereby
 stipulate that the following exhibits be filed under seal in connection with the Declaration of
 Thomas J. Romano in Support of Defendants’ Opposition to Plaintiff Kensington Technology
 Group’s Motion for Summary Judgment:

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- **Exhibit H:** Copy of Opposition Expert Report of Steven A. Velinsky Regarding Infringement of Claims 1, 4, 5, 7 And 9 of U.S. Patent No. 6,553,794
- **Exhibit I:** Excerpts from the 30(B)(6) deposition of Janet Dulsky, taken May 16, 2008.
- **Exhibit K:** Excerpts from the deposition of David A. Dornfeld, Ph.D., taken September 5, 2008.

The parties believe that the deposition testimony listed above should be filed under seal because it has been designated “Highly Confidential-Attorneys’ Eyes Only” under the Stipulated Protective Order and includes competitively sensitive discussion of activities connected to the prosecution of the patent-in-suit and related patents, as well as product development and confidential internal practices.

The parties further believe that the Opposition Expert Report of Steven A. Velinsky Regarding Infringement of Claims 1, 4, 5, 7 and 9 of U.S. Patent No. 6,553,794 should be filed under seal because it has been designated “Highly Confidential—Attorneys’ Eyes Only” under the Stipulated Protective Order and includes and discusses material from deposition transcripts that are currently designated “Highly Confidential-Attorneys’ Eyes Only” under the Stipulated Protective Order.

Consistent with the parties’ belief that all of the information listed above should be filed under seal, the parties also stipulate to filing Defendants’ Memorandum in Opposition to Plaintiff Kensington Technology Group’s Motion for Summary Judgment under seal because it discusses the material listed above.

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DATED: September 26, 2008

/s/ Brian Smith
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Attorneys for Plaintiff
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KENSINGTON TECHNOLOGY GROUP

DATED: September 26, 2008

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Attorneys for Defendants,
PC GUARDIAN ANTI-THEFT
PRODUCTS, INC. and FELLOWES, INC.

IT IS SO ORDERED.


Honorable Susan Illston
United States District Court Judge

DATED: _____