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 9 UNITED STATES DISTRICT COURT
 10 NORTHERN DISTRICT OF CALIFORNIA
 11 SAN FRANCISCO DIVISION

12 ACCO BRANDS, INC. d/b/a KENSINGTON)
 TECHNOLOGY GROUP,,)
 13 Plaintiff,)
 14 v.)
 15 PC GUARDIAN ANTI-THEFT PRODUCTS,)
 INC. and FELLOWES, INC.,)
 16 Defendant.)

Case No. 04-03526 SI

) **STIPULATION AND [PROPOSED]**
) **ORDER TO FILE UNDER SEAL**
) **EXHIBITS 18, 19, 20, 21 AND 22 TO THE**
) **DECLARATION OF BRIAN SMITH IN**
) **SUPPORT OF PLAINTIFF’S**
) **OPPOSITION TO DEFENDANTS’**
) **MOTION FOR SUMMARY JUDGMENT**
) **OF INVALIDITY,**
) **UNENFORCEABILITY FOR**
) **INEQUITABLE OCNDUCT, AND NO**
) **WILLFULL INFRINGEMENT**

) Date: October 22, 2008
) Time: 2:00 p.m.
) Dept. Courtroom 10, 19th Floor
) Judge: The Honorable Susan Illston

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 22 Plaintiff ACCO Brands, Inc. d/b/a Kensington Technology Group (“Kensington”) and
 23 Defendant PC Guardian Anti-Theft Products, Inc. and Fellowes, Inc., hereby stipulate that Plaintiff
 24 Kensington Group’s Exhibits 18, 19, 20, 21 and 22 to the Declaration of Brian Smith in Support of
 25 Kensington Group’s Opposition to Defendants’ Motion for Summary Judgment of Invalidity,
 26 Unenforceability for Inequitable Conduct, and No Willful Infringement should be filed under seal.

1 Exhibit 18 contains excerpts from the deposition of Janet Dulsky from July 17, 2008
2 defendants have designated this transcript as “Highly Confidential – Attorneys’ Eyes Only” under the
3 Stipulated Protective Order in this action.

4 Exhibit 19 contains excerpts from the deposition of Stewart Carl from April 15, 2008
5 defendants have designated this transcript as “Highly Confidential – Attorneys’ Eyes Only” under the
6 Stipulated Protective Order in this action.

7 Exhibit 20 contains excerpts from the deposition of Arthur Zarnowitz from April 15, 2008
8 defendants have designated this transcript as “Highly Confidential – Attorneys’ Eyes Only” under the
9 Stipulated Protective Order in this action.

10 Exhibit 21 contains excerpts from the deposition of Noah Groth from August 28, 2008
11 defendants have designated this transcript as “Highly Confidential – Attorneys’ Eyes Only” under the
12 Stipulated Protective Order in this action.

13 Exhibit 22 contains excerpts from the deposition of William Murray from April 14, 2008
14 defendants have designated this transcript as “Highly Confidential – Attorneys’ Eyes Only” under the
15 Stipulated Protective Order in this action.

16 Plaintiff, Kensington Group’s Opposition to Defendant’s Motion for Summary Judgment of
17 Invalidation, Unenforceability for Inequitable Conduct, and No Willful Infringement relies on and cites
18 the deposition testimony contained in and Exhibits 18, 19, 20, 21 and 22 to the Declaration of Brian
19 Smith and therefore should be filed under seal for the same reasons.

20 Dated: September 26, 2008

21 HOWREY LLP

22 By: /s/ Brian A.E. Smith
23 Brian A.E. Smith
24 Attorneys for Plaintiff
25 ACCO BRANDS, INC. d/b/a
26 KENSINGTON TECHNOLOGY GROUP

27 STIPULATION AND PROPOSED
28 TO FILE EXHIBITS UNDER SEAL
Case No. 04-03526 SI

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Dated: September 26, 2008

KOLISCH HARTWELL, P.C.

By: /s/ Thomas J. Romano
Thomas J. Romano
Attorneys for Defendants PC GUARDIAN
ANTI-THEFT PRODUCTS, INC. and
FELLOWES, INC.

IT IS SO ORDERED.



Dated: _____

Hon. Susan Illston
Judge, United States District Court