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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

**STIPULATION TO FILE MATERIALS  
UNDER SEAL IN CONNECTION WITH  
DEFENDANTS' REPLY IN SUPPORT  
OF THEIR MOTION FOR SUMMARY  
JUDGMENT**

22 Plaintiff ACCO Brands, Inc. d/b/a/ Kensington Technology Group ("ACCO") and  
23 defendants PC Guardian Anti-Theft Products, Inc. ("PC Guardian") and Fellowes, Inc. hereby  
24 stipulate that the following exhibits be filed under seal in connection with the Declaration of  
25 Elizabeth A. Tedesco in Support of Defendants' Reply in Support of Their Motion for Summary  
26 Judgment of Invalidity, Unenforceability for Inequitable Conduct, and No Willful Infringement:  
27

- 1     ▪ **Exhibit A:** Excerpt from the deposition of David A. Dornfeld, Ph.D., taken September 5, 2008.
- 2     ▪ **Exhibit J:** Excerpt from the Responsive Expert Report of David A. Dornfeld, Ph.D.,
- 3       Regarding Validity of U.S. Patent No. 6,553, 794.

4           The parties believe that the deposition testimony and expert report listed above should be  
5 filed under seal because it has been designated “Highly Confidential-Attorneys’ Eyes Only”  
6 under the Stipulated Protective Order.

8 DATED: October 3, 2008

/s/ Brian Smith  
Brian Smith  
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16 DATED: October 3, 2008

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

24 **IT IS SO ORDERED.**

26 DATED: \_\_\_\_\_

  
\_\_\_\_\_  
Honorable Susan Illston  
United States District Court Judge