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11 [Additional counsel appear on signature page.]

12 UNITED STATES DISTRICT COURT
 13 NORTHERN DISTRICT OF CALIFORNIA

14 TASH HEPTING, GREGORY HICKS,)	No. C-06-00672-VRW
15 CAROLYN JEWEL and ERIK KNUTZEN, on)	
16 Behalf of Themselves and All Others Similarly)	<u>CLASS ACTION</u>
17 Situated,)	
)	NOTICE OF MOTION AND
)	ADMINISTRATIVE MOTION PURSUANT
)	TO CIVIL LOCAL RULES 7-11 AND 79-5
)	TO SEAL PLAINTIFFS' STATEMENT IN
18 vs.)	SUPPORT OF MOTION BY LYCOS, INC.
)	AND WIRED NEWS FOR ORDERS
19 AT&T CORP., et al.)	(1) PERMITTING INTERVENTION AND
)	(2) UNSEALING DOCUMENTS
20 Defendants.)	

21 DATE: June 23, 2006
 22 TIME: 9:30 a.m.
 23 COURTROOM: The Hon. Vaughn R.
 Walker, Chief Judge

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1 TO: ALL PARTIES AND THEIR ATTORNEYS OF RECORD

2 PLEASE TAKE NOTICE that plaintiffs will, and hereby do, move for administrative relief
3 pursuant to Civil Local Rules 7-11 and 79-5(d). Plaintiffs are filing a statement in support of motion
4 by Lycos, Inc. and Wired News for orders permitting intervention and unsealing documents. For the
5 assistance of the Court in deciding the media motions to unseal, and because the media intervenors
6 do not have access to the unredacted Declaration of Mark Klein in Support of Plaintiffs' Motion for
7 Preliminary Injunction ("Klein Declaration"), plaintiffs have prepared and included in their
8 statement a chart correlating information currently redacted from the Klein Declaration with publicly
9 available sources of the same information. Given the Court's minute order, dated May 17, 2006, and
10 the redactions to the Klein Declaration agreed upon by parties, plaintiffs are lodging under seal their
11 statement in support.

12 This motion is based on this notice of motion and motion, the statement in support of motion
13 by Lycos, Inc. and Wired News for orders permitting intervention and unsealing documents and all
14 associated papers filed therewith, and the pleadings and papers on file in this action.

15 DATED: June 12, 2006

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20 _____ /s/ Cindy A. Cohn

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1 CERTIFICATE OF SERVICE

2 I hereby certify that on June 12, 2006, I electronically filed the foregoing with the Clerk of
3 the Court using the CM/ECF system which will send notification of such filing to the e-mail
4 addresses denoted on the attached Electronic Mail Notice List, and I hereby certify that I have
5 mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF
6 participants indicated on the attached Manual Notice List.

7
8 _____/s/
9 MARIA V. MORRIS

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19 I, Maria V. Morris, am the ECF User whos ID and password are being used to file this
20 NOTICE OF MOTION AND ADMINISTRATIVE MOTION PURSUANT TO CIVIL LOCAL
21 RULES 7-11 AND 79-5 TO SEAL PLAINTIFFS' STATEMENT IN SUPPORT OF MOTION BY
22 LYCOS, INC. AND WIRED NEWS FOR ORDERS (1) PERMITTING INTERVENTION AND
23 (2) UNSEALING DOCUMENTS. In compliance with General Order 45, X.B., I hereby attest that
24 Cindy A. Cohn has concurred in this filing.
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Mailing Information for a Case 3:06-cv-00672-VRW

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Manual Notice List

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