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17 Attorneys for Defendants
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19 UNITED STATES DISTRICT COURT
 20 NORTHERN DISTRICT OF CALIFORNIA
 21 OAKLAND DIVISION

23 ORACLE USA, INC., et al.,
 24 Plaintiffs,
 25 v.
 26 SAP AG, et al.,
 27 Defendants.

Case No. 07-CV-1658 PJH (EDL)

**DEFENDANTS' ADMINISTRATIVE
 MOTION TO PERMIT DEFENDANTS
 TO FILE UNDER SEAL ORACLE'S
 INFORMATION IN SUPPORT OF THE
 PARTIES' JOINT STATEMENT
 REGARDING EXHIBIT OBJECTIONS**

1 Pursuant to Local Rules 7-11(a) and 79-5(c), Plaintiff Oracle International Corporation
2 (“Oracle”) and Defendants SAP AG, SAP America, Inc., and TomorrowNow, Inc. (“Defendants,”
3 and together with Oracle, the “Parties”) request that the Court order the Clerk of the Court to file
4 under seal the following portions of the Parties’ Joint Statement Regarding Exhibit Objections
5 (“Joint Statement”), which the parties will lodge with the Court on June 6, 2012: 9:14-17; 10:6;
6 12:6-10; 13:6-10; 14:21; 17:10-12; 17:13-15; 17:23-24; 18:6-9; 19:3-5; 21:11-14; 22:9-16; 25:6-
7 8; 27:9-14; 31:26-27; 31:28-32:3; 32:18-27; 34:9-14; 34:25; 35:17; 35:21-27; 36:6-7; 36:28-37:4;
8 37:17-18; 37:22-23; 37:24-25; 38:6-9; 39:18-23; 39:25-27; 39:28-402; and 40:4-6.

9 The requested relief sought is necessary and narrowly tailored to protect the alleged
10 confidentiality of the content of Oracle’s information put at issue by the Joint Statement. This
11 request is supported by the accompanying Declaration of Tharan Gregory Lanier in Support of
12 Defendants’ Administrative Motion to File under Seal Oracle’s Information in Support of the
13 Parties’ Joint Statement Regarding Exhibit Objections.

14 Pursuant to Local Rule 79-5, a proposed order and stipulation accompanies this request to
15 file under seal.

16 Dated: June 5, 2012

JONES DAY

17 By: /s/ Tharan Gregory Lanier

18 Tharan Gregory Lanier

19 Counsel for Defendants
20 SAP AG, SAP AMERICA, INC., and
TOMORROWNOW, INC.

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