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20 UNITED STATES DISTRICT COURT
 21 NORTHERN DISTRICT OF CALIFORNIA
 22 OAKLAND DIVISION

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

CASE NO. 07-CV-01658 PJH (EDL)

**DECLARATION OF BREE HANN IN
 SUPPORT OF PLAINTIFFS'
 ADMINISTRATIVE MOTION TO
 PERMIT PLAINTIFFS TO FILE
 UNDER SEAL DEFENDANTS'
 INFORMATION SUPPORTING
 PLAINTIFFS' MOTION TO
 MODIFY THE PROTECTIVE
 ORDER AND TO COMPEL
 DEPOSITION TESTIMONY AND
 FURTHER RESPONSES TO
 REQUESTS FOR ADMISSIONS**

Case No. 07-CV-01658 PJH (EDL)

1 I, Bree Hann, declare:

2 1. I am an attorney at law licensed to practice in the State of California and
3 before this Court, and am counsel at Bingham McCutchen LLP, counsel of record for plaintiffs
4 Oracle USA, Inc., Oracle International Corporation, Oracle EMEA Limited, and Siebel Systems,
5 Inc. (together, "Oracle") in this action. I have personal knowledge of the facts stated below by
6 virtue of my representation of Oracle in this action, and, if called as a witness, could competently
7 testify as to them.

8 2. Pursuant to Civil Local Rule 79-5 and the stipulated Protective Order entered
9 on June 6, 2007 in this case, I make this Declaration in support of Plaintiffs' Administrative
10 Motion to Permit Plaintiffs to File Under Seal Defendants' Information Supporting Plaintiffs'
11 Motion to Modify the Protective Order and to Compel Deposition Testimony and Further
12 Responses to Requests for Admissions ("Motion to Compel").

13 3. Plaintiffs file this motion at Defendants' request. The requested relief is
14 necessary and narrowly tailored to protect the alleged confidentiality of the materials put at issue
15 by Plaintiffs' Motion to Compel until such time as Defendants may submit a declaration in
16 accordance with Civil Local Rule 79-5(d), and the Court makes a final ruling as to
17 confidentiality of the relevant subject matter.

18 4. Specifically, Exhibit T to the Declaration of Chad Russell in Support of
19 Plaintiffs' Motion to Compel, lodged with the Court on December 11, 2009, contains
20 information designated by Defendants under the Protective Order in this action.

21 I declare under the laws of the United States and the State of California that the
22 foregoing is true and correct and that this Declaration was executed on December 11, 2009, in
23 San Francisco, California.

24 /s/ Bree Hann

25 Bree Hann

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