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UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 OAKLAND DIVISION

ORACLE USA, INC., *et al.*,
 Plaintiffs,
 v.
 SAP AG, *et al.*,
 Defendants.

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

**STIPULATION TO PERMIT PLAINTIFFS
 TO FILE UNDER SEAL INFORMATION
 SUPPORTING ORACLE'S OPPOSITION
 TO DEFENDANTS' MOTION TO COMPEL**

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

1 Pursuant to Local Rules 7-11(a) and 79-5(c), Plaintiffs Oracle USA, Inc., Oracle
2 International Corporation, Oracle EMEA Limited, and Siebel Systems, Inc. (“Plaintiffs”) and
3 Defendants SAP AG, SAP America, Inc., and TomorrowNow, Inc. (“Defendants,” and together
4 with Plaintiffs, the “Parties”) jointly submit this Stipulation to Permit Plaintiffs to File Under
5 Seal Information Supporting Plaintiffs’ Opposition to Defendants’ Motion to Compel.

6 Plaintiffs have filed an Administrative Motion to Permit Plaintiffs to File Under
7 Seal Information Supporting Plaintiffs’ Opposition to Defendants’ Motion to Compel
8 (“Administrative Motion”).

9 WHEREAS, the requested relief in the Administrative Motion is necessary and
10 narrowly tailored to protect the alleged confidentiality of the materials described in the
11 Administrative Motion until such time as the Court makes a final ruling as to confidentiality of
12 the relevant subject matter. Specifically, the Parties have informed each other that the following
13 materials constitute documents that contain information designated by Plaintiffs or Defendants as
14 “Confidential Information” or “Highly Confidential Information - Attorneys’ Eyes Only”
15 pursuant to the Stipulated Protective Order, or otherwise contains information for which there is
16 good cause to seal.

17 (1) Portions of the Declaration of Zachary J. Alinder in Support of Oracle’s
18 Opposition to Defendants’ Motion to Compel at ¶ 13 and Exhibits F, G, H, K, L, P, DD, and EE
19 thereto;

20 (2) Portions of the Declaration of Jason Rice in Support of Opposition at ¶ 3, lines 12-
21 17 and ¶ 6, lines 9-18; and

22 (3) Portions of the Declaration of Buffy Ransom in Support of Opposition at ¶ 9, lines
23 18-25 and Exs. A and B thereto.

24 NOW, THEREFORE, IT IS HEREBY STIPULATED by the Parties, through their
25 respective counsel of record, that Plaintiffs are permitted to move for permission to file under
26 seal the information identified in the preceding paragraph.

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