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15
16 **UNITED STATES DISTRICT COURT**

17 **NORTHERN DISTRICT OF CALIFORNIA-SAN FRANCISCO DIVISION**

18
19 IN RE LDK SOLAR SECURITIES
20 LITIGATION

Master File No. C-07-05182-WHA (BZ)

21 This Document Relates To:
22 All Actions.

23
24 **NOTICE OF ADMINISTRATIVE
MOTION AND ADMINISTRATIVE
MOTION PURSUANT TO CIV. L.R. 79-
5(d) REQUESTING A SEALING ORDER
FOR A DOCUMENT DESIGNATED BY A
NON-PARTY AS CONFIDENTIAL**

25 Date: No Hearing Set
26 Time: No Time Set
27 Ctrm: G, 15th Floor
28 Hon. Magistrate Judge Bernard Zimmerman

1 **I. NOTICE OF MOTION**

2 **TO THE COURT AND ALL PARTIES OF RECORD:**

3 NOTICE IS HEREBY GIVEN that Lead Plaintiff Shahpour Javidzad ("Plaintiff") will, and
4 hereby does, request under Civil Local Rule 79-5(d) an Order sealing Exhibit H to the Declaration of
5 Anthony D. Phillips in Support of Plaintiff's Motion to Compel Production of Certain Documents
6 Listed on Defendants' Privilege Log ("Exhibit H") and redacting those portions of Lead Plaintiff's
7 Notice of Motion and Motion to Compel Production of Certain Documents Listed on Defendants'
8 Privilege Log and Memorandum of Points and Authorities in Support ("Motion to Compel") that
9 reference Exhibit H.

10 **II. DISCUSSION**

11 Exhibit H is a letter from non-party Simpson Thacher Bartlett, LLP ("Simpson Thacher") to
12 the United States Securities and Exchange Commission. Simpson Thacher produced Exhibit H to
13 Plaintiff during the course of discovery. Simpson Thacher designated Exhibit H "Confidential"
14 pursuant to the September 23, 2008 Protective Order (Docket Number 130). Plaintiff has lodged
15 Exhibit H and an unredacted version of his Motion to Compel with the Clerk and requests a sealing
16 Order in accordance with Civil Local Rule 79-5(d).


17 Plaintiff understands that, pursuant to Local Rule 79-5(d), Simpson Thacher will file (a) a
18 declaration establishing that Exhibit H is sealable, and (b) a proposed sealing order.

19 **III. CONCLUSION**

20 Plaintiff respectfully requests that the Court grant his motion sealing Exhibit H and redacting
21 his Motion to Compel accordingly.

22 DATED: July 22, 2009

BERMAN DEVALERIO

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25 Christopher T. Heffelfinger
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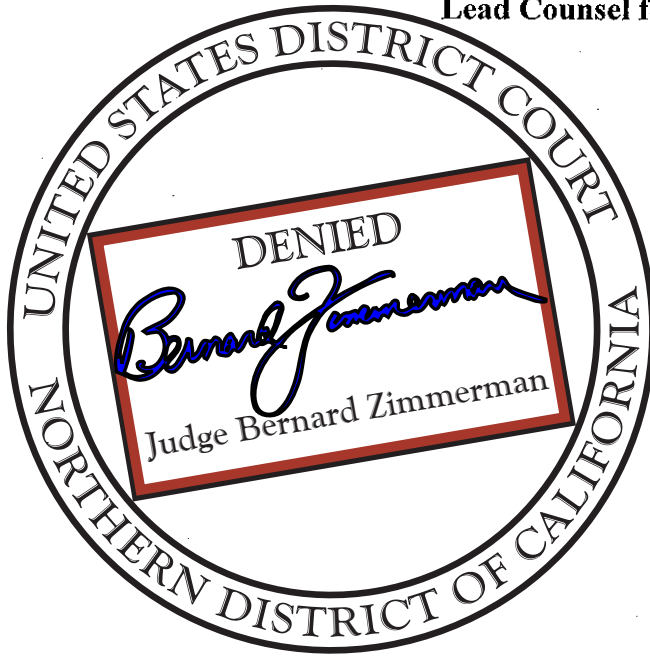
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DATED: August 13, 2009
DENIED - No showing made under L.R. 79-5(d).