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10	Attorneys for Motion Picture Studio Plaintiffs/Declaratory	
11	Relief Claim Defendants	Declaratory
12	UNITED STATES DISTRICT COURT	
14	NORTHERN DISTRICT OF CALIFORNIA	
15	REALNETWORKS, INC., et al.,	CASE NO. C 08-4548-MHP
16	Plaintiffs,	APPLICATION TO SEAL HIGHLY
17	VS.	CONFIDENTIAL VERSIONS OF (1) RESPONSE MEMORANDUM OF STUDIO
18	DVD COPY CONTROL ASSOCIATION,	PLAINTIFFS IN SUPPORT OF MOTION FOR PRELIMINARY INJUNCTION; (2)
19	INC., et al,.	SUPPLEMENTAL DECLARATION OF JONATHAN H. BLAVIN
20	Defendants.	Date: April 24, 2009 Time: 9:00 a.m.
21		Ctrm: 15 (Hon. Marilyn Hall Patel) Lodged concurrently herewith: 1) [Proposed]
22		Order Granting Application and 2) Documents Requested To Be Filed Under Seal
23	UNIVERSAL CITY STUDIOS PRODUCTIONS LLLP, et al.,	CASE NO. C 08-4719-MHP
24	Plaintiffs,	
25	VS.	
26	REALNETWORKS, INC., et al.	
27	Defendants.	
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1	Pursuant to Civil Local Rule 7-11 and 79-5, Columbia Pictures Industries, Inc., Disney	
2	Enterprises, Inc., NBC Universal, Inc., Paramount Pictures Corporation, Sony Pictures	
3	Entertainment, Inc., Sony Pictures Television, Inc., Twentieth Century Fox Film Corporation,	
4	Universal City Studios LLLP, Universal City Studios Productions LLLP, Viacom, Inc., Walt	
5	Disney Pictures, and Warner Bros. Entertainment, Inc. (collectively, "the Studios") respectfully	
6	apply for an order sealing the highly confidential versions of the following documents:	
7	(1) Response Memorandum of Studio Plaintiffs in Support of Motion for	
8	Preliminary Injunction	
9	(2) Supplemental Declaration of Jonathan H. Blavin	
10	A "compelling reason" exists to seal these documents. See Kamakana v. City and County	
11	of Honolulu, 447 F.3d 1172, 1178 (9th Cir. 2006) (holding that "[a] party seeking to seal a	
12	judicial record bears the burden of overcoming the 'compelling reasons' standard"); <i>Foltz v</i> .	
13	State Farm Mut. Auto. Ins. Co., 331 F.3d 1122, 1135-36 (9th Cir. 2003). The confidential	
14	material at issue divulges aspects of the Studios' and Real's proprietary business, technical, and	
15	trade secret information. This material has been designated by the Studios and Real as	
16	"confidential" or "highly confidential" pursuant to the protective order governing this litigation,	
17	and is thus being manually filed under seal.	
18	This Application to Seal is narrowly tailored to protect the public's interest in access to	
19	judicial records and the public policies favoring disclosure. <i>Kamakana</i> , 447 F.3d at 1178. The	
20	Studios have filed with the Court public redacted versions of the aforementioned documents.	
21	For these reasons, the Court should grant the Application to Seal.	
22	DATED: April 10, 2009 MUNGER, TOLLES & OLSON LLP	
23		
24	By: /s/ Jonathan H. Blavin	
25	By: /s/ Jonathan H. Blavin JONATHAN H. BLAVIN	
26	Attorneys for Studio Defendants/Counterclaim-	
27	Plaintiffs/Plaintiffs	
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