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 Counterclaim Defendants  
 10 REALNETWORKS, INC. and  
 REALNETWORKS HOME  
 11 ENTERTAINMENT, INC.

12 UNITED STATES DISTRICT COURT  
 13 NORTHERN DISTRICT OF CALIFORNIA

14 REALNETWORKS, INC., a Washington  
 15 Corporation; and REALNETWORKS HOME  
 ENTERTAINMENT, INC., a Delaware  
 16 corporation,

17 Plaintiffs,

18 v.

19 DVD COPY CONTROL ASSOCIATION, INC., a  
 Delaware nonprofit corporation, DISNEY  
 20 ENTERPRISES, INC., a Delaware corporation;  
 PARAMOUNT PICTURES CORP., a Delaware  
 21 corporation; SONY PICTURES ENTER., INC., a  
 Delaware corporation; TWENTIETH CENTURY  
 22 FOX FILM CORP., a Delaware corporation; NBC  
 UNIVERSAL, INC., a Delaware corporation;  
 23 WARNER BROS. ENTER. INC., a Delaware  
 corporation; and VIACOM, Inc., a Delaware  
 24 Corporation,

25 Defendants.

Case Nos. C08 04548 MHP;  
 C08 04719 MHP

**ADMINISTRATIVE MOTION FOR  
 FILING UNDER SEAL THE EXHIBITS  
 TO REALNETWORKS, INC. AND  
 REALNETWORKS HOME  
 ENTERTAINMENT, INC.'S  
 DEPOSITION DESIGNATIONS FOR  
 PRELIMINARY INJUNCTION  
 PROCEEDING**

26  
 27 AND RELATED CASES  
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**ADMINISTRATIVE MOTION FOR FILING UNDER SEAL**

Pursuant to Civil Local Rules 7-11 and 79-5 (b), RealNetworks, Inc. and RealNetworks Home Entertainment, Inc. (collectively “RealNetworks”) respectfully request an order to file under seal the following documents: Exhibits A through F, inclusive, to RealNetworks, Inc. and RealNetworks Home Entertainment, Inc.’s Deposition Designations for Preliminary Injunction Proceeding.

A “compelling reason” exists to seal these documents. *Kamakana v. City and County of Honolulu*, 447 F.3d 1172, 1178 (9th Cir. 2006) (holding that aside from grand jury transcripts and warrant materials, “[a] party seeking to seal a judicial record. . . bears the burden of overcoming the ‘compelling reasons’ standard”). Trade secrets and other confidential research, development, or commercial information may properly be protected by the court. *See* Fed.R.Civ.P. 26(c).

Here, the exhibits filed under seal contain RealNetworks’ propriety business, technical and trade secret information relating to RealDVD and the New Platform. Further, they contain propriety business, technical and trade secret information of the defendants and third parties. Additionally, much of the material has been designated “confidential” or “highly confidential” under the stipulated protective order governing this action.

RealNetworks has made conscientious efforts to seal only the confidential or highly confidential material necessary to protect its sensitive business, technical or personal information, as well as the sensitive information of the other parties. Thus, this Administrative Motion to Seal is narrowly tailored to preserve the public’s interest in accessing judicial records. *Kamakana*, 447 F.3d at 1178. Therefore, the Court should grant this administrative motion.

1 As required by Civil Local Rule 79-5(b), RealNetworks has lodged with the Clerk copies  
2 of above-mentioned exhibits.

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4 WILSON SONSINI GOODRICH & ROSATI  
Professional Corporation

5  
6 By: /s/Michael A. Berta  
Michael A. Berta

7 Attorneys for Plaintiffs and Counterclaim  
8 Defendants REAL NETWORKS, INC. and  
9 REALNETWORKS HOME  
ENTERTAINMENT, INC.

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