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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.

26  
 27 AND RELATED CASES  
 28

Case Nos. C08 04548 MHP;  
 C08 04719 MHP

**ADMINISTRATIVE MOTION FOR  
 FILING UNDER SEAL THE REDACTED  
 VERSION OF REALNETWORKS'  
 PROPOSED FINDINGS OF FACT AND  
 CONCLUSIONS OF LAW**

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**ADMINISTRATIVE MOTION FOR FILING UNDER SEAL**

Pursuant to Civil Local Rules 7-11 and 79-5(c), RealNetworks, Inc. and RealNetworks Home Entertainment, Inc. (collectively “RealNetworks”) respectfully request an order to file under seal the following document: The unredacted version of RealNetworks’ Proposed Findings of Fact and Conclusions of Law.

A “compelling reason” exists to seal this document. *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 redacted portions of the document under seal contain propriety business, technical and trade secret information belonging to RealNetworks (relating to the RealDVD Products) and to the DVD CCA (relating to the Content Scramble System). Additionally, much of the material to be redacted has been designated “confidential” or “highly confidential” under the stipulated protective order governing this action, or reflects testimony given during portions of the preliminary injunction hearing when the courtroom was sealed by this Court’s order.

RealNetworks has made conscientious efforts to redact and seal only the confidential or highly confidential material necessary to protect the sensitive business, technical or personal information of the parties to this action. 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. A redacted version of RealNetworks’ Proposed Findings of Fact and Conclusions of Law has been publicly filed with the Court. Therefore, the Court should grant this administrative motion.

1 As required by Civil Local Rule 79-5(c), RealNetworks has filed a redacted  
2 version of the document to be filed under seal that will be in the public record if the Court grants  
3 the sealing order.

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5 WILSON SONSINI GOODRICH & ROSATI  
Professional Corporation

6  
7 By:  /s/  
Leo Cunningham

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