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Attorneys for Motion Picture Studio Parties

[Additional counsel listed on signature page.]

14 UNITED STATES DISTRICT COURT  
 15 NORTHERN DISTRICT OF CALIFORNIA

16 REALNETWORKS, INC., et al.,  
 17 Plaintiffs,  
 18 vs.  
 19 DVD COPY CONTROL ASSOCIATION,  
 20 et al.,  
 21 Defendants.

CASE NO. C 08-4548 MHP  
**MOTION PICTURE STUDIO PARTIES'  
 AND DVD CCA'S SUBMISSION OF  
 CHANGES TO PROPOSED  
 PRELIMINARY INJUNCTION ORDER**  
 Judge: Hon. Marilyn Hall Patel  
 Crtrm: 15

22 UNIVERSAL CITY STUDIOS  
 PRODUCTIONS LLLP, et al.,  
 23 Plaintiffs,  
 24 vs.  
 25 REALNETWORKS, INC, et al.,  
 26 Defendants.  
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CASE NO. C-08-4719 MHP

1 The Court’s Preliminary Injunction Order (“Order”) states that the “The Studios and DVD  
2 CCA may submit a proposed order for injunctive relief if anything further is sought” or invites a  
3 stipulated proposed order. The Studios and the DVD CCA do not seek any further relief than the  
4 Court granted in its Order.

5 The Studios and the DVD CCA do request, however, that the summary of the Court’s  
6 injunction, set forth at pages 56 and 57 of the Order, make explicit that the injunction  
7 encompasses not only circumvention or breach of CSS but also circumvention of ARccOS or  
8 RipGuard. The Order found that “the Studios are likely to prevail on their claim that RealDVD  
9 circumvents ARccOS or RipGuard in violation of the copy-control section of the DMCA.”  
10 (Order ¶ 111.) But the summary of the Order on pages 56 and 57 does not reference ARccOS or  
11 RipGuard. While ARccOS and RipGuard are used on CSS-protected DVD content, adding  
12 ARccOS and RipGuard expressly to the summary of the Order will avoid any potential  
13 uncertainty.

14 The Studios thus submit the attached proposed order which adds the words “ARccOS-  
15 protected or RipGuard-protected” after “CSS-protected” in the summary to avoid any argument  
16 that the Court’s injunction permits circumvention of ARccOS or RipGuard. Given that Real has  
17 already submitted the report and supporting declaration regarding compliance with the injunction  
18 required by the Order, the attached proposed order does not require another such report to be  
19 filed.

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1 DATED: September 25, 2009

Respectfully submitted,

2 MUNGER, TOLLES & OLSON LLP

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5 By:         /s/ Glenn D. Pomerantz          
                                GLENN D. POMERANTZ

6 Attorneys for Motion Picture Studio Parties

7 DATED: September 25, 2009

8 AKIN GUMP STRAUSS HAUER & FELD, LLP

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11 By:         /s/ Reginald D. Steer          
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12 Attorneys for DVD Copy Control Association

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