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 13 UNITED STATES DISTRICT COURT  
 14 NORTHERN DISTRICT OF CALIFORNIA  
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 17 GOOGLE INC. AND YOUTUBE LLC,  
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 Plaintiffs,  
 19  
 vs.  
 20 IPVALUE MANAGEMENT INC.  
 21  
 Defendants.  
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CASE NO. 3:11-mc-80016-RS

**PLAINTIFFS' MISCELLANEOUS  
 ADMINISTRATIVE REQUEST  
 PURSUANT TO CIVIL LOCAL RULES 7-  
 11 AND 79-5 TO FILE DOCUMENTS  
 UNDER SEAL**

1 Per Local Rules 7-11 and 79-5, Plaintiffs Google Inc. and YouTube LLC request an Order  
2 sealing portions of the letter brief being submitted today in accordance with the Court's January  
3 28, 2011 Order. (D.I. 10.) This request is supported by the Declaration of Eugene Novikov  
4 ("Novikov Administrative Declaration").

5 The portions of the letter brief Google Inc. and YouTube LLC seek to seal reference and  
6 disclose the contents of exhibits B, C, and D attached to the Declaration of Eugene Novikov (D.I.  
7 8) that was filed in Support of Google and YouTube's Motion To Compel Production of  
8 Documents from Third Party IPValue Management Inc. (D.I. 5.) The Court has previously  
9 granted Google and YouTube's Request to seal those exhibits, and the portions of the Motion to  
10 Compel that reference those exhibits. (D.I. 4.) As set forth in that Request (D.I. 1), and the  
11 accompanying Declarations of John LaBarre (D.I. 2) and Eugene Novikov (D.I. 3), the exhibits  
12 contain competitively sensitive information relating to Google's licensing negotiations with a third  
13 party, and were designated confidential by producing party Xerox Corporation under the  
14 Protective Order in place in the concurrent Delaware action. (Ex. A to D.I. 3.) The content of  
15 these exhibits should thus be kept confidential.


16 Pursuant to Local Rule 79-5 (c), Defendants are manually filing two sealed copies of the  
17 letter brief that identify the portions of the brief Defendants are requesting to seal.

18 Accordingly, Defendants respectfully request that they be allowed to file under seal the  
19 portion of the letter brief referencing exhibits B, C and D to the previously-filed Declaration of  
20 Eugene Novikov (D.I. 8).

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1 DATED: February 1, 2011

QUINN EMANUEL URQUHART &  
SULLIVAN, LLP

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4 By   
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