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8 Google Inc., YouTube, LLC, and Google UK Ltd.

9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA
11 SAN JOSE DIVISION

13 BE IN, INC., a New York Corporation,)
14 Plaintiff,)
15 v.)
16 GOOGLE INC., a California corporation;)
YOUTUBE, LLC, a Delaware limited liability)
17 company, and GOOGLE UK LTD., a private)
18 limited company registered in England and)
Wales,)
19 Defendants.)

Case No.: 5:12-cv-03373-LHK-HRL
**DECLARATION OF RIANA S.
PFEFFERKORN IN SUPPORT OF
MOTION TO SEAL**
Judge: Hon. Howard R. Lloyd

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1 I, Riana S. Pfefferkorn, declare:

2 1. I am an associate at the law firm Wilson Sonsini Goodrich & Rosati in San
3 Francisco, California, counsel for Defendants Google Inc., YouTube, LLC, and Google UK Ltd.
4 I have personal knowledge of the facts stated in this declaration and, if called upon to do so, I
5 would and could competently testify thereto.

6 2. Attached as Exhibit A is a true and correct copy of the parties' Discovery Dispute
7 Joint Report #2 ("Joint Report").

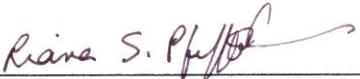
8 3. Attached as Exhibit B is a true and correct copy of Exhibit B to the Joint Report,
9 which contains a true and correct copy of excerpts from Plaintiff's supplemental responses to
10 Google's first set of interrogatories to Plaintiff, dated October 1, 2013.

11 4. The Joint Report (Exhibit A hereto) quotes from Plaintiff's supplemental response
12 to Interrogatory No. 1, which Plaintiff has designated "Confidential," and quotes from a
13 document referenced in those responses which Plaintiff has also designated "Confidential."
14 Plaintiff contends that its response to Interrogatory No. 1 and the document referenced therein
15 contain alleged trade secrets.

16 5. Exhibit B to the Joint Report (Exhibit B hereto) contains Plaintiff's original and
17 supplemental responses to Interrogatory No. 1, both of which Plaintiff has designated
18 "Confidential."

19 I declare under penalty of perjury under the laws of the United States of America that the
20 foregoing is true and correct to the best of my knowledge. Executed this 11th day of October,
21 2013, at San Francisco, California.

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Riana S. Pfefferkorn