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 23 SEGAN LLC

24 **IN THE UNITED STATES DISTRICT COURT**  
 25 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**  
 26 **SAN FRANCISCO DIVISION**

27 SEGAN LLC,

28 Plaintiff,

v.

ZYNGA INC.,

Defendant.

Case No. 3:14-cv-01315-VC

**STIPULATION AND ~~PROPOSED~~  
 ORDER TO FILE UNDER SEAL  
 DOCUMENTS IN SUPPORT OF SEGAN  
 LLC'S OPPOSITION TO ZYNGA  
 INC.'S MOTION FOR BOND**

Date: November 20, 2014  
 Time: 10:00 a.m.  
 Place: 4, 17th Floor  
 Judge: Honorable Vince Chhabria

1 Pursuant to L.R. 79.5, Plaintiff Segan LLC (“Segan”) and Defendant Zynga, Inc. (“Zynga”)  
2 hereby stipulate and respectfully move the Court to enter an Order sealing the following exhibit filed  
3 in support of Segan’s Response in Opposition to Zynga’s Motion for Bond, filed concurrently  
4 herewith.

- 5 • Exhibit D to the Declaration of David A. Dorey, Esq. (“Dorey Declaration”).
- 6 • A quotation of language in Exhibit D of the Dorey Declaration on page 5 of Segan’s  
7 Response in Opposition to Zynga’s Motion for Bond.

8 The Stipulation is made for the following reasons:

9 This Exhibit was marked “HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY” by  
10 Zynga pursuant to a Stipulated protective Order entered into by the parties and approved by the  
11 Court on September 4, 2014.

12 Exhibit D to the Dorey Declaration contains information that Zynga has identified as  
13 confidential and proprietary business information of Zynga regarding game development and source  
14 code processes. Pursuant to the protective Order, Zynga contends that that disclosure of this  
15 information would harm it by providing competitors with otherwise unavailable information.

16 This application is narrowly tailored to seal only confidential information rather than  
17 information that has already been publicly disclosed.

18 In accordance with L.R. 79-5, Segan is filing a redacted copy of its Response in Opposition  
19 to Zynga’s Motion for Bond and is filing the entire Exhibit D of the Dorey Declaration under seal.  
20 This Stipulation is accompanied by the Declaration of David A. Dorey, Esq.

21 WHEREFORE, Segan and Zynga respectfully request that the Court enter an Order granting  
22 the relief requested above. A proposed Order is attached.

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SO STIPULATED:

DATED: October 30, 2014

BLANK ROME LLP

By: /s/ David A. Dorey

DAVID A. DOREY

Attorney for Plaintiff

Segan LLC

DATED: October 30, 2014

DURIE TANGRI LLP

By: /s/ Durie Tangri

DURIE TANGRI

Attorney for Defendant

Zynga, Inc.

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**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

**IT IS SO ORDERED:**

Segan LLC may file under seal the following documents:

- Exhibit "D" to the Declaration of David A. Dorey, Esq. attached to Segan LLC's Response in Opposition to Zynga, Inc.'s Motion for Bond.
- An un-redacted version of Segan LLC's Response in Opposition to Zynga, Inc.'s Motion for Bond, containing a quotation from Exhibit "D" to the Declaration of David A. Dorey, Esq., attached thereto.

Dated: November 7, 2014



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HONORABLE VINCE CHHABRIA  
UNITED STATES DISTRICT COURT JUDGE