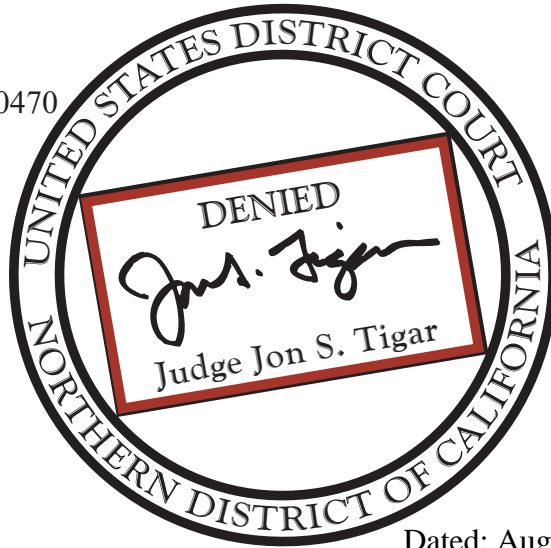


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Dated: August 14, 2019

13 Attorneys for Defendant
 14 ZSCALER, INC.

15 UNITED STATES DISTRICT COURT
 16 NORTHERN DISTRICT OF CALIFORNIA
 17 SAN FRANCISCO DIVISION

18 SYMANTEC CORPORATION and
 19 SYMANTEC LIMITED,

Plaintiffs,

v.

21 ZSCALER, INC.,

Defendant.

Case No. 3:17-cv-04414-JST

**STIPULATION AND [PROPOSED]
 ORDER RE: SEALING PROCEDURE
 FOR CROSS-MOTIONS FOR PARTIAL
 SUMMARY JUDGMENT**

Judge: Honorable Jon S. Tigar

Date Filed: June 22, 2017

Trial Date: June 14, 2021

1 Pursuant to Civil Local Rule 6-2, Plaintiffs Symantec Corporation and Symantec Limited
2 (collectively, "Symantec") and Defendant Zscaler, Inc. ("Zscaler") hereby stipulate and agree as
3 follows:

4 WHEREAS, the Court has issued a scheduling order (ECF 189) setting deadlines for
5 cross-motions for summary judgment on the issue of assignor estoppel;

6 WHEREAS, the deadline for the final brief in the above-referenced scheduling order is
7 September 30, 2019;

8 WHEREAS, the parties anticipate that their filings will all involve Protected Material as
9 defined by the Stipulated Protective Order (ECF 75);

10 WHEREAS, the burden of filing, responding to, and ruling on four separate administrative
11 motions to seal is likely to be significant for both the parties and the Court, and can be mitigated
12 if deferred until after briefing is complete;

13 NOW, THEREFORE, THE PARTIES HEREBY AGREE AND STIPULATE to request
14 an order from the Court providing that:

- 15 • In connection with assignor-estoppel summary judgment-briefing, each party need
16 file only one administrative motion to seal under Civil Local Rule 79-5(d) after
17 briefing is complete.
- 18 • Before filing their administrative motions to seal, the parties may file on the public
19 docket only redacted copies of materials for which they anticipate seeking a
20 sealing order. At the same time, the parties will serve each other with unredacted
21 courtesy copies of all materials at the time they are filed and file proofs of service
22 to that effect. The parties will also supply the Court with unredacted courtesy
23 copies of all materials at the time they are filed.
- 24 • The administrative motions to seal will be filed no later than October 7, 2019.
25 Declarations required under Civil Local Rule 79-5(e)(1) will be filed no later than
26 October 14, 2019.

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Respectfully submitted,
KEKER, VAN NEST & PETERS LLP

Dated: August 12, 2019

By: /s/ Jay Rapaport
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Attorneys for Defendant
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Dated: August 12, 2019

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SYMANTEC CORP. AND SYMANTEC
LTD.

ATTESTATION

I certify under Civil Local Rule 5-1(i)(3) that all signatories to this document concur in its filing.

Dated: August 12, 2019

/s/ Jay Rapaport
JAY RAPAPORT

[PROPOSED] ORDER

DATED: _____

HONORABLE JON S. TIGAR
UNITED STATES DISTRICT JUDGE