

1 PRUETZ LAW GROUP LLP
 2 Adrian M. Pruetz (Bar No. CA 118215)
 3 E-mail: ampruetz@pruetzlaw.com
 4 Erica J. Pruetz (Bar No. CA 227712)
 5 E-mail: ejpruetz@pruetzlaw.com
 6 200 N. Sepulveda Blvd. Suite 1525
 7 El Segundo, CA 90245
 8 Telephone: (310) 765-7650
 9 Facsimile: (310) 765-7641

6 LEE TRAN & LIANG APLC
 7 Enoch H. Liang (Bar No. CA 212324)
 8 E-mail: ehl@ltlcounsel.com
 9 Steven R. Hansen (Bar No. CA 198401)
 10 E-mail: srh@ltlcounsel.com
 11 Edward S. Quon (Bar No. 214197)
 12 E-mail: eq@ltlcounsel.com
 13 601 S. Figueroa St., Suite 4025
 14 Los Angeles, CA 90017
 15 Telephone: (213) 612-3737
 16 Facsimile: (213) 612-3773

12 Attorneys for Defendant and Counterclaimant
 13 NETLIST, INC.

14 UNITED STATES DISTRICT COURT
 15 NORTHERN DISTRICT OF CALIFORNIA
 16 OAKLAND DIVISION

18 GOOGLE, INC.,

19 Plaintiff,

20 vs.

21 NETLIST, INC.,

22 Defendant.

CASE NO. C-08-04144 SBA

[Related to CASE NO. C-09-05718 SBA]

**DEFENDANT NETLIST, INC.'S
 ADMINISTRATIVE MOTION TO FILE
 ITS REPLY IN SUPPORT OF ITS
 MOTION FOR SUMMARY JUDGMENT
 OF INFRINGEMENT AND IN
 OPPOSITION TO GOOGLE'S MOTION
 FOR SUMMARY JUDGMENT OF NON-
 INFRINGEMENT AND RELATED
 EXHIBITS UNDER SEAL**

Date: July 27, 2010

Time: 1:00 p.m.

Place: Courtroom 3

Judge: Hon. Sandra Brown Armstrong

25 _____
 26 AND RELATED COUNTERCLAIMS

ADMINISTRATIVE MOTION TO FILE UNDER SEAL

1
2 Pursuant to General Order No. 62 and Civil Local Rules 7-11 and 79-5, Defendant and
3 Counterclaimant Netlist, Inc. (“Netlist”) hereby requests that the Court file Netlist, Inc.’s Reply in
4 Support of Its Motion for Summary Judgment of Infringement and in Opposition to Google’s
5 Motion for Summary Judgment of Non-Infringement (“Netlist’s Reply Brief”) and Exhibits 1 and
6 5 of the Declaration of Steven R. Hansen in Support of Netlist’s Reply in Support of its Motion
7 for Summary Judgment of Infringement and in Opposition to Google’s Motion for Summary
8 Judgment of Non-Infringement (“Hansen Reply Dec.”) under seal. This request is based on this
9 administrative motion, the Declaration of Steven R. Hansen in support thereof, and such oral
10 argument as the Court may entertain. As required by Civil Local Rules 79-5(b)-(d) and General
11 Order No. 62, the following papers are also being lodged with the Court: (1) a Chamber’s copy of
12 Netlist, Inc.’s Reply in Support of Its Motion for Summary Judgment of Infringement and in
13 Opposition to Google’s Motion for Summary Judgment of Non-Infringement, and (2) a
14 Chamber’s copy of the Declaration of Steven R. Hansen in Support of Netlist’s Reply in Support
15 of its Motion for Summary Judgment of Infringement and in Opposition to Google’s Motion for
16 Summary Judgment of Non-Infringement and Exhibits Thereto.

17 Paragraph 26 of the Court’s Second Amended Protective Order, dated March 5, 2010
18 requires the parties to file under seal all “transcripts of depositions, exhibits, answers to
19 interrogatories, pleadings, briefs, and other documents submitted to the Court that have been
20 designated as Protected Information or which contain information so designated.” Netlist’s Reply
21 Brief includes information designated by Google and third parties IDT and NEC as Protected
22 Information under the terms of the Second Amended Protective Order. The information includes
23 excerpts of exhibits and deposition transcripts that have been so designated. Accordingly, Netlist
24 is obligated to file Netlist’s Reply Brief and Exhibits 1 and 5 to the Hansen Reply Dec. under
25 seal. Netlist respectfully requests that the Court grant its application to file the foregoing
26 documents under seal. Pursuant to the Court’s Scheduling Order, the parties met and conferred
27 regarding this motion.
28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Dated: July 6, 2010

LEE TRAN & LIANG, APLC

By: /s/ Steven R. Hansen

Steven R. Hansen
Attorneys for Defendant and Counterclaimant
NETLIST, INC.