

1 JOHN L. SLAFSKY, State Bar No. 195513
 2 DAVID L. LANSKY, State Bar No. 199952
 3 HOLLIS BETH HIRE, State Bar No. 203651
 4 WILSON SONSINI GOODRICH & ROSATI
 5 PROFESSIONAL CORPORATION
 6 650 Page Mill Road
 7 Palo Alto, CA 94304
 8 Telephone: (650) 493-9300
 9 Fax: (650) 493-6811
 10 jslafsky@wsgr.com
 11 dlansky@wsgr.com
 12 hhire@wsgr.com

13 Attorneys for Defendant/Counterclaimant,
 14 GODADDY.COM, INC.

15 UNITED STATES DISTRICT COURT
 16 NORTHERN DISTRICT OF CALIFORNIA

12	PETROLIAM NASIONAL BERHAD,)	CASE NO.: 09-CV-5939 PJH
)	
13	Plaintiff,)	
)	
14	vs.)	DECLARATION OF JOSEPH G.
)	FIORINO IN SUPPORT OF
15	GODADDY.COM, INC.,)	GO DADDY'S ADMINISTRATIVE
)	MOTION TO SEAL
16	Defendant.)	
)	
17)	
)	
18	_____)	Date: December 7, 2011
)	Time: 9:00 a.m.
19	GODADDY.COM, INC.,)	Courtroom: 3
)	
20	Counterclaimant,)	Honorable Phyllis J. Hamilton
)	
21	vs.)	
)	
22	PETROLIAM NASIONAL BERHAD,)	
)	
23	Counterclaim Defendant.)	
)	

24
 25 I, Joseph G. Fiorino, declare:

26 1. I am an attorney admitted to practice law before this Court, and am an associate of
 27 the law firm of Wilson Sonsini Goodrich & Rosati, P.C., counsel for Defendant and
 28 Counterclaimant GoDaddy.com, Inc. ("Go Daddy"). I have personal knowledge of the facts set

1 forth in this Declaration. I submit this declaration in support of Go Daddy's Administrative
2 Motion to Seal.

3 2. On November 28, 2011, counsel for Go Daddy received via U.S. mail a copy of the
4 November 25, 2011 Declaration of Perry Clark In Support of Plaintiff Petronas's Opposition to Go
5 Daddy's Motion for Summary Judgment ("Clark Opposition Declaration") and a CD containing
6 exhibits thereto.

7 3. Attached hereto as Exhibit A is a true and correct copy of the November 9, 2011
8 Declaration of Nima Kelly In Support of Plaintiff's Administrative Motion to Seal (Dkt. No. 124),
9 setting forth compelling reasons for the sealing of Go Daddy's standard operating procedure for
10 dealing with incoming trademark claims (the "SOP"), which constitutes Exhibit 24 to the
11 November 24, 2011 Declaration of Perry Clark In Support of Plaintiff Petronas's Motion for
12 Partial Summary Judgment on Go Daddy's Liability for Contributory Cybersquatting ("Clark
13 MPSJ Declaration"). Ms. Kelly is Deputy General Counsel at Go Daddy.

14 4. Attached hereto as Exhibit B is a true and correct copy of the November 9, 2011
15 Declaration of Greg Schwimer In Support of Plaintiff's Administrative Motion to Seal (Dkt. No.
16 124), which sets forth compelling reasons for the sealing of certain sections of the transcript of the
17 October 19, 2011 deposition of Jeff Munson found on page 11 at lines 4-10 and 14-16, page 13 at
18 lines 9-13, page 14 at lines 7-24, page 16 at lines 1-25, page 17 at lines 1-4, page 19 at lines 6-9
19 and 22-24, page 22 at lines 6-8, page 23 at lines 3-7 and 17-25, and all of pages 24-26 (the
20 "Munson Excerpts"), which are located within pages 187-190 of Exhibit 26 to the Clark MPSJ
21 Declaration, and within pages 82-85 of Exhibit 6 to the Clark Opposition Declaration. Mr.
22 Schwimer is the Director of Information Technology in the Architecture Group at Go Daddy.

23 5. Attached hereto as Exhibit C is a true and correct copy of the Court's November 18,
24 2011 Order Granting Plaintiff's Motion to Seal In Part and Denying It In Part (Dkt. No. 133). The
25 Order finds that compelling reasons exist for sealing the SOP and Munson Excerpts.

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1 I declare under penalty of perjury that the foregoing is true and correct. Executed at Palo
2 Alto, California, on December 2, 2011.

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4 /s/ Joseph G. Fiorino
Joseph G. Fiorino

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