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13	Attorneys for Defendant/Counterclaim Plaintiff MotionPoint Corporation	Attorneys for McDermott Will & Emery LLP		
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15	UNITED STATES DISTRICT COURT			
16	NORTHERN DISTRICT OF CALIFORNIA			
17	OAKLAND DIVISION			
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19	TRANSPERFECT GLOBAL, INC.,	Case No. CV 10-02590 CW (JCS)		
20	TRANSPERFECT TRANSLATIONS INTERNATIONAL, INC., AND	STIPULATION AND [PROPOSED]		
21	TRANSLATIONS.COM, INC.,	ORDER RE: MOTION TO SEAL PORTIONS OF MOTIONPOINT'S		
22	Plaintiffs/Counterclaim Defendants,	OPPOSITION TO TRANSPERFECT'S MOTION FOR DISQUALIFICATION		
23	·	[CLR 7-11, 7-12, 79-5]		
24	V.	Date: June 6, 2012		
25	MOTIONPOINT CORPORATION,	Time: 9:00 a.m. Judge: Hon. Joseph C. Spero		
26	Defendant/Counterclaim Plaintiff.	ouuge. Hon. Joseph C. Spero		
27				
28				

STIPULATION AND PROPOSED ORDER

Case No. CV 10-02590 CW (JCS)

ATTORNEYS AT LAW WASHINGTON	
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1	STIPULATION			
2	WHEREAS, TransPerfect has identified or designated certain	WHEREAS, TransPerfect has identified or designated certain information as confidential		
3	and has requested that such information be sealed;	and has requested that such information be sealed;		
4	4 WHEREAS, portions of MotionPoint's Opposition to T	ransPerfect's Motion for		
5	5 Disqualification, the McCaffrey Declaration and Exhibits F-L, and	Disqualification, the McCaffrey Declaration and Exhibits F-L, and the Freed Declaration and		
6	Exhibit B contain information that TransPerfect has identified or designated as confidential;			
7	THEREFORE, the parties hereby stipulate and agree that MotionPoint may, pursuant to			
8	Civil Local Rule 79-5(d), file a redacted version of its Opposition to TransPerfect's Motion for			
9	9 Disqualification, as well as a redacted versions of the McCaffrey Dec	Disqualification, as well as a redacted versions of the McCaffrey Declaration and Exhibits F-L,		
10	and the Freed Declaration and Exhibit B. MotionPoint will also simul	and the Freed Declaration and Exhibit B. MotionPoint will also simultaneously lodge under seal		
11	with the Court the unredacted versions of these documents.			
12	12 SO STIPULATED.			
13	13			
14	, and the second			
15	15 \frac{\langle s/ \text{ Alexander Ott}}{\text{Alexander Ott}}			
16	16 Attorneys for Defe	ndant/Counterclaim		
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18	75/ 12. Okey Onyejekwe	er		
19	L. Okey Onyejekwe Jr., M.D. Adrian J. Sawyer			
20	Attorneys for Plaintiffs/Counterclaim Attorneys for McD Defendants TransPerfect Global, Inc.,	ermott Will & Emery LLP		
21	21 Transperfect Translations International,			
22	Inc., and Translations.com, Inc.			
23				
24	24	[PROPOSED] ORDER		
25	PURSUANT TO STIPULATION, IT IS SO ORDERED Date: June 4, 2012	The state of the s		
26				
27	Hon. JOSE United State Judge Jos	eph C. Spero		
28	28			
	STIPLII ATION AND PROPOSED ORDER - 2 - Case	No. CV 10-02590 CW (ICS)		

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1	I, Adrian Sawyer, am the ECF User whose ID and password are being used to file this		
2	STIPULATION AND [PROPOSED] ORDER RE: MOTION TO SEAL PORTIONS OF		
3	MOTIONPOINT'S OPPOSITION TO TRANSPERFECT'S MOTION FOR		
4	DISQUALIFICATION [CLR 7-11, 7-12, 79-5]. In compliance with General Order 45, X.B., I		
5	hereby attest that Alexander Ott, Counsel for Defendant MotionPoint Corporation, and L. Okey		
6	Onyejekw, Counsel for Plaintiffs, has concurred in this filing.		
7			
8	DATED: June 1, 2012 KERR & WAGSTAFFE LLP		
9			
10	By <u>/s/ Adrian J. Sawyer</u> Adrian J. Sawyer		
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MOTIONPOINT'S OPPOSITION TO TRANSPERFECT'S MOTION FOR DISQUALIFICATION