

1 W. Bryan Farney (Tex. Bar No. 6826600) *Pro Hac Vice*  
Wayne M. Harding (Tex. Bar No. 08978500)  
2 Steven R. Daniels (Cal. Bar No. 235398)  
Jennifer Towle (Cal. Bar No. 225095)  
3 FARNEY DANIELS LLP  
800 S. Austin Ave., Suite 200  
4 Georgetown, Texas 78626  
Telephone: (512) 582-2828  
5 Facsimile: (512) 582-2829  
E-Mails: BFarney@farneydaniels.com  
6 WHarding@farneydaniels.com  
SDaniels@farneydaniels.com  
7 JTowle@farneydaniels.com

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9 ATTORNEYS FOR  
**ORG STRUCTURE INNOVATIONS LLC and**  
**PAUL MORINVILLE**

10 UNITED STATES DISTRICT COURT  
11 NORTHERN DISTRICT OF CALIFORNIA  
12 OAKLAND DIVISION

13 ORACLE CORPORATION, a Delaware  
14 corporation, and ORACLE AMERICA, INC., a  
15 Delaware corporation,

16 Plaintiffs,

17 v.

18 ORG STRUCTURE INNOVATIONS LLC, a  
19 Texas limited liability company, and PAUL  
MORINVILLE, an individual resident of  
Indiana,

20 Defendants.  
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Case No. 11-cv-03549-SBA

**STIPULATION AND ORDER  
GRANTING JOINT  
ADMINISTRATIVE MOTION TO  
FILE UNDER SEAL PORTIONS OF  
JOINT CASE MANAGEMENT  
STATEMENT AND REPORT  
PURSUANT TO FED. R. CIV. P. 26(f)**

Hon. Sandra Brown Armstrong

1 PAUL V. MORINVILLE and ORG  
2 STRUCTURE INNOVATIONS LLC,

3 Plaintiffs,

4 v.

5 ORACLE CORPORATION and ORACLE  
6 AMERICA, INC.,

7 Defendants.

Case No. 12-cv-00297-SBA

10 ORG STRUCTURE INNOVATIONS LLC,

11 Plaintiff,

12 v.

13 ORACLE CORPORATION and ORACLE  
14 AMERICA, INC.,

15 Defendants.

Case No. 12-cv-00348-SBA

1 WHEREAS Defendant Morinville filed an Administrative Motion to Seal the Complaint in  
2 this action on the grounds that it contains confidential information (Dkt. No. 7);

3 WHEREAS the Court issued an Order granting Defendant's Motion to Seal the Complaint  
4 and directing that the Complaint be filed under seal (Dkt. No. 10);

5 WHEREAS the Oracle parties do not believe that the Complaint contains any information  
6 appropriate for filing under seal and have moved the Court for reconsideration of its Order sealing  
7 the Complaint (Dkt. No. 39);

8 WHEREAS Morinville and ORG Structure Innovations, LLC believe that the Complaint  
9 does contain confidential information that should be sealed, and that quotations or discussions of  
10 that confidential information in other pleadings also should be sealed;

11 WHEREAS portions of the parties' Joint Case Management Statement and Report Pursuant  
12 to Federal Rule of Civil Procedure 26(f) refer to the Complaint;

13 WHEREAS in light of the Court's Order sealing the Complaint, Morinville and ORG  
14 Structure seek to file under seal those portions of their Joint Case Management Statement and  
15 Report Pursuant to Federal Rule of Civil Procedure 26(f) that refer to the Complaint;

16 WHEREAS this action concerns a patent license agreement ("Agreement") that Morinville  
17 and ORG Structure contend contains confidential business information and that is subject to a  
18 confidentiality agreement;

19 WHEREAS that Agreement has been filed under seal in this action (Dkt. No. 43 Ex. 2);

20 WHEREAS portions of the parties' Joint Case Management Statement and Report Pursuant  
21 to Federal Rule of Civil Procedure 26(f) refer to information in the Agreement that Morinville and  
22 ORG Structure contend is confidential;

23 WHEREAS Oracle does not believe that its Complaint or the Joint Case Management  
24 Statement and Report Pursuant to Federal Rule of Civil Procedure 26(f) contain any information  
25 appropriate for filing under seal and has moved this Court for reconsideration of the Order sealing  
26 the Complaint, (Dkt. No. 39.), but in light of the Court's Order sealing Oracle's Complaint and out  
27 of an abundance of caution, Oracle stipulates to Morinville and ORG Structure's request that  
28 portions of the Joint Case Management Statement that cite or refer to the Complaint's allegations be

1 filed under seal.

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3 ACCORDINGLY, IT IS HEREBY STIPULATED AND AGREED that, with the Court's  
4 permission, the parties may file under seal in accordance with Civil Local Rule 79-5 those portions  
5 of their Joint Case Management Statement and Report Pursuant to Federal Rule of Civil Procedure  
6 26(f) that refer to the Complaint or that Morinville and ORG Structure contend refer to confidential  
7 information in the Agreement.

8  
9 IT IS SO STIPULATED AND AGREED.

10  
11 Dated: April 16, 2012

FARNEY DANIELS LLP

By: /s/ Steven R. Daniels

Steven R. Daniels

800 South Austin Avenue, Suite 200  
Georgetown, Texas 78626

Attorneys for  
ORG STRUCTURE INNOVATIONS LLC  
and PAUL MORINVILLE

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17 Dated: April 16, 2012

HOGAN LOVELLS US LLP

By: /s/ Maren J. Clouse

Maren J. Clouse

Attorneys for  
ORACLE CORPORATION  
and ORACLE AMERICA, INC.

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IT IS SO ORDERED.

Sandra B. Armstrong

United States District Judge

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STIP. AND ORDER GRANTING JOINT ADMINISTRATIVE MOTION TO FILE UNDER SEAL  
CASE NO. 11-cv-03549-SBA