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 7 GOOGLE INC.

8 UNITED STATES DISTRICT COURT
 9 NORTHERN DISTRICT OF CALIFORNIA

11 GOOGLE INC., a Delaware corporation,
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 Plaintiff,
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 v.
 14 AMERICAN BLIND & WALLPAPER
 15 FACTORY, INC., a Delaware corporation
 d/b/a decoratetoday.com, Inc., and DOES 1-
 16 100, inclusive,
 17 Defendants.

Case No. C 03-5340-JF (RS)

**NOTICE OF MOTION AND MOTION
 FOR ADMINISTRATIVE RELIEF
 SEEKING AN ORDER SEALING
 DOCUMENTS FOR FILING IN
 RELATION TO GOOGLE'S MOTION
 FOR TERMINATING, EVIDENTIARY,
 AND MONETARY SANCTIONS
 AGAINST ABWF FOR SPOILIATION OF
 EVIDENCE**

18 AMERICAN BLIND & WALLPAPER
 19 FACTORY, INC., a Delaware corporation
 d/b/a decoratetoday.com, Inc.,
 20
 Counter-Plaintiff,
 21
 v.
 22 GOOGLE INC.,
 23
 Counter-Defendant.
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**NOTICE OF MOTION AND MOTION FOR ADMINISTRATIVE
RELIEF SEALING DOCUMENTS**

TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

Pursuant to Civil Local Rules 79-5(d) and 7-11(a), Plaintiff and Counter-Defendant Google Inc. (“Google”) hereby gives notice to all counsel of record of its Motion for Administrative Relief Seeking an Order Sealing Documents For Filing in Relation to Google’s Motion for Terminating, Evidentiary, and Monetary Sanctions Against ABWF for Spoliation of Evidence (“Administrative Motion”). By way of this Administrative Motion, Google requests an order sealing: 1) certain portions of its Memorandum of Points and Authorities In Support of Google’s Motion for Terminating, Evidentiary, and Monetary Sanctions Against ABWF for Spoliation of Evidence (“Google’s Motion”) , and 2) certain exhibits to the Declaration of Ajay Krishnan (“Krishnan Declaration”) that were were designated “Confidential” or “Attorneys’ Eyes Only” by American Blind & Wallpaper Factory, Inc. (“American Blind”) pursuant to the Stipulated Protective Order signed by all parties to this litigation and approved by the Court on September 19, 2005 (“Protective Order”).

The Krishnan Declaration attaches as Exhibit E, the Declaration of Susan Greenspon, which was already filed under seal in this action. The Krishnan Declaration also attaches as Exhibits F, G, N and O, pages of deposition transcripts that American Blind has designated portions of as “ Confidential” or “Attorneys’ Eyes Only” pursuant to the Protective Order. And The Krishnan Declaration also attaches Exhibits P and Q, which are documents designated “Confidential” or “Attorneys’ Eyes Only” pursuant to the Protective Order. Google’s Motion refers to information contained in the exhibits.

Pursuant to Local Rules 79-5(d), Google moves to file under seal 1) unredacted copies of the Google’s Motion, and 2) Exhibits E, F, G, N, O, P and Q to the Krishnan Declaration. Pursuant to Civil Local Rule 79-5(d), an unredacted version of Google’s Motion, and the Krishnan Decl. are lodged with the Clerk concurrently with this Administrative Motion.

1 Local Rule 79-5(d) outlines the procedure that American Blind must follow within five
2 days of the filing of this Administrative Motion if it wishes to maintain the confidential
3 designation of Exhibits E, F, G, N, O, P, and Q.

4 Dated: December 26, 2006

KEKER & VAN NEST, LLP

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By: /s/ Ajay S. Krishnan
AJAY S. KRISHNAN
Attorneys for Plaintiff and Counter Defendant
GOOGLE INC.

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