

1 Robert N. Phillips (SBN 120970)
Ethan B. Andelman (SBN 209101)
2 HOWREY LLP
525 Market Street, Suite 3600
3 San Francisco, CA 94105
Telephone: (415) 848-4900
4 Facsimile: (415) 848-4999

5 David A. Rammelt (Admitted *Pro Hac Vice*)
Susan J. Greenspon (Admitted *Pro Hac Vice*)
6 KELLEY DRYE & WARREN LLP
333 West Wacker Drive, Suite 2600
7 Chicago, IL 60606
Telephone: (312) 857-7070
8 Facsimile: (312) 857-7095

9 Attorneys for Defendant/Counter-Plaintiff
10 AMERICAN BLIND AND WALLPAPER
FACTORY, INC.

11 UNITED STATES DISTRICT COURT
12 NORTHERN DISTRICT OF CALIFORNIA

13 GOOGLE INC., a Delaware corporation,

14 Plaintiff,

15 v.

16 AMERICAN BLIND & WALLPAPER
FACTORY, INC., a Delaware corporation
17 d/b/a decoratetoday.com, Inc.; and DOES 1-
100, inclusive,

18 Defendants.

19 AMERICAN BLIND & WALLPAPER
FACTORY, INC., a Delaware corporation
20 d/b/a decoratetoday.com, Inc.,

21 Counter-Plaintiff,

22 v.

23 GOOGLE, INC.

24 Counter-Defendants.

25 TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

26 Pursuant to Civil Local Rules 79-5 and 7-11(a), Defendant American Blind and Wallpaper
27 Factory, Inc. ("American Blind") hereby gives notice to all counsel of record of its Motion for
28

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

**NOTICE OF MOTION AND MOTION FOR
ADMINISTRATIVE RELIEF SEEKING
AN ORDER SEALING DOCUMENTS FOR
FILING**

Date: February 16, 2007
Time: 9:00 a.m.
Courtroom: 3
Hon. Jeremy Fogel

1 Administrative Relief Seeking an Order Sealing Documents for Filing. By way of this motion,
2 American Blind requests an order sealing:

- 3
- 4 • Exhibit J to the Declaration of Susan Greenspon in support of Defendant American
5 Blind and Wallpaper Factory, Inc.'s Opposition to Google Inc.'s Motion for
6 Terminating, Evidentiary and Monetary Sanctions Against ABWF for Spoliation
7 of Evidence, which contains true and correct copies of the Kaden Company
8 Studies produced by American Blind, Bates range ABWF002950 – 003017. These
9 documents have been designated "Attorneys Eyes Only" by American Blind
10 pursuant to the terms of the Protective Order in place in this case because they
11 contain confidential and sensitive proprietary information concerning American
12 Blind.

12 For these reasons, and pursuant to Local Rule 79-5(b), American Blind moves to file
13 under seal the following document: Exhibit J to the Declaration of Susan Greenspon.

14 American Blind also requests an order sealing:

- 15
- 16 • Exhibits G, H, I, and K to the Declaration of Paul Garrity In Support Of Defendant
17 American Blind And Wallpaper Factory, Inc.'s Opposition To Google Inc.'s
18 Motion For Summary Judgment, which contain true and correct copies of
19 deposition transcripts of Google personnel. These documents have been
20 designated "Attorneys Eyes Only" by Google pursuant to the terms of the
21 Protective Order in place in this case.

22 For these reasons, and pursuant to Local Rule 79-5(d), American Blind moves to file
23 under seal the following documents: Exhibits G, H, I, and K to the Declaration of Paul Garrity.

24 Pursuant to Civil Local Rule 79-5(b), Exhibit J to the Declaration of Susan Greenspon and
25 Exhibits G, H, I, and K to the Declaration of Paul Garrity are being lodged with the Clerk
26 concurrent with the filing of this motion.
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DATED: January 26, 2007

HOWREY LLP

By: /s/ Robert N. Phillips
ROBERT N. PHILLIPS
ETHAN B. ANDELMAN

David A. Rammelt
Susan J. Greenspon
KELLEY DRYE & WARREN LLP
333 West Wacker Drive, Suite 2600
Chicago, IL 60606

Attorneys for Defendant/Counter-Plaintiff
AMERICAN BLIND AND WALLPAPER
FACTORY, INC.