

1 DAVID T. BIDERMAN, Bar No. 101577  
 2 JUDITH B. GITTERMAN, Bar No. 115661  
 3 M. CHRISTOPHER JHANG, Bar No. 211463  
**PERKINS COIE LLP**  
 4 Four Embarcadero Center, Suite 2400  
 San Francisco, CA 94111-4131  
 Telephone: (415) 344-7000  
 Facsimile: (415) 344-7050  
 5 Email: [DBiderman@perkinscoie.com](mailto:DBiderman@perkinscoie.com)  
 Email: [JGitterman@perkinscoie.com](mailto:JGitterman@perkinscoie.com)  
 6 Email: [CJhang@perkinscoie.com](mailto:CJhang@perkinscoie.com)

7 Attorneys for Defendant Google Inc.

8

9

**UNITED STATES DISTRICT COURT**

10

**NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION**

11

12

CLRB HANSON INDUSTRIES, LLC d/b/a  
INDUSTRIAL PRINTING, and HOWARD  
13 STERN, on behalf of themselves and all others  
similarly situated,

14

Plaintiffs,

15

v.

16

GOOGLE, INC.,

17

Defendant.

18

19

20

21

22

23

24

25

26

27

28

CASE NO. C O5-03649 JW

**DECLARATION OF M.  
CHRISTOPHER JHANG IN SUPPORT  
OF GOOGLE INC.'S  
ADMINISTRATIVE MOTION FOR  
LEAVE TO FILE A DOCUMENT  
UNDER SEAL PURSUANT TO CIV.  
L.R. 79-5**

Date: June 21, 2007  
Time: 10:00 a.m.  
Dept.: Courtroom 8  
Judge: Honorable James Ware

1 I, M. Christopher Jhang, hereby declare as follows:

2 1. I am an attorney duly licensed to practice law in all of the courts of the State of  
3 California and this Court, and am an attorney with the law firm of Perkins Coie LLP, counsel for  
4 defendant Google Inc. (“Google”) in this action. I submit this declaration in support of Google’s  
5 Administrative Motion For Leave To File A Document Under Seal Pursuant To Civ. L.R. 79-5.  
6 I have personal knowledge of the facts set forth below except as to those matters stated on  
7 information and belief, and as to those matters, I believe them to be true. If called upon to  
8 testify, I could and would testify competently as to the matters set forth herein.

9 2. On or about March 2, 2007, Google and plaintiffs CLRB Hanson Industries, LLC,  
10 d/b/a Industrial Printing, and Howard Stern (“Plaintiffs”) executed and filed with the Court their  
11 [Proposed] Stipulated Protective Order Regarding Confidential Information. On May 15, 2007,  
12 the Court executed the parties’ Stipulated Protective Order (with amendments). A true and  
13 correct copy of the Court-executed Stipulated Protective Order is attached hereto as Exhibit A.

14 3. The Stipulated Protective Order provides two tiers of confidential designations.  
15 The first tier covers information designated “Confidential,” which the Stipulated Protective  
16 Order generally describes as “those things that may be disclosed to the parties or their counsel  
17 for the purposes of the litigation, but which must be protected against disclosure to third parties.”  
18 Stipulated Protective Order, ¶ 4. The second tier covers information designated “Confidential –  
19 Trade Secret/Attorneys’ Eyes Only,” which the protective order generally describes as “those  
20 information or materials which are of a proprietary, business or technical nature that might  
21 reasonably be of value to a competitor or potential customer of the party or nonparty holding the  
22 proprietary rights thereto or might reasonably pose a commercial disadvantage to the producing  
23 party and must be protected from disclosure.” *Id.*

24 4. On April 26, 2007, I sent Plaintiffs’ counsel, Lester Levy and Michele Raphael, a  
25 letter providing Google’s tailored confidentiality designations for the deposition transcripts of  
26 Google employees Heather Wilburn, Shivakumar Venkataraman, and Michael Schulman. A true  
27 and correct copy of this letter is attached hereto as Exhibit B.

