1 2 3 4 5 6 7 8 9	Scott R. Mosko (State Bar No. 106070) scott.mosko@finnegan.com FINNEGAN, HENDERSON, FARABOW, GARRETT & DUNNER, L.L.P. Stanford Research Park 3300 Hillview Avenue Palo Alto, California 94304 Telephone: (650) 849-6600 Facsimile: (650) 849-6666 Attorneys for Defendants Pacific Northwest Software, Inc., Winston Williams, and Wayne Chang		
10	UNITED STATES DI	STRICT COURT	
11	NORTHERN DISTRICT OF CALIFORNIA		
12	SAN JOSE DIVISION		
13	FACEBOOK, INC., and MARK ZUCKERBERG,	CASE NO. C 07-01389 RS	
14	Plaintiffs,	DEFENDANTS' ADMINISTRATIVE	
15 16	v.	MOTION TO FILE UNDER SEAL THE HIGHLIGHTED AND UNREDACTED VERSION OF	
17	CONNECTU LLC, (now known as CONNECTU INC.), ET AL.,	DEFENDANTS CONNECTU LLC, PACIFIC NORTHWEST SOFTWARE,	
18	Defendants.	INC., WINSTON WILLIAMS AND WAYNE CHANG'S (REVISED)	
19		OPPOSITION TO PLAINTIFFS' MOTION FOR PARTIAL SUMMARY HIDCMENT: AND DECLARATION	
20		JUDGMENT; AND DECLARATION OF WINSTON WILLIAMS (REVISED) IN SUPPORT THEREOF	
21		DECLARATION OF SCOTT R.	
22		MOSKO	
23		[PROPOSED] ORDER	
24		Date: February 27, 2008 10, 2007 Time: 9:30 a.m.	
25		Courtroom.: 4 Judge: Honorable Richard Seeborg	
26			
27			
28	Doc. No. 479384	DEFENDANTS' ADMINISTRATIVE MOTION AND [PROPOSED ORDER TO FILE DOCUMENTS UNDER SEAL Case No. 5:07-CV-01389-RS	

ja.

### ADMINISTRATIVE MOTION FOR FILING UNDER SEAL

### 1. Papers Submitted for Partial Filing Under Seal

Pursuant to Civil Local Rules 7-11 and 79-5(c), Defendants respectfully hereby request leave of Court to file under seal certain portions of the following document being lodged with the Clerk:

a. The highlighted and unredacted version of Defendants ConnectU LLC, Pacific Northwest Software, Inc., Winston Williams and Wayne Chang's (Revised) Opposition to Plaintiffs' Motion for Partial Summary Judgment ("Opposition"). This Opposition contains discussions regarding confidential materials filed in support of it, as well as excerpts of the April 25, 2006 deposition of Plaintiff Mark Zuckerberg. This deposition was designated Highly Confidential, Attorney's Eyes Only by Plaintiffs pursuant to the Stipulated Protective Order in the Santa Clara County Superior Court action, Case No. 1:05-CV-047381, and hence is subject to Local Civil Rule 79-5(c) and the excerpts should be sealed from public view.

As required by Civil Local Rule 79-5(c), Defendants are lodging with the Clerk copies of this Opposition which has been designated Highly Confidential for filing under seal.

2.

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

## Papers Submitted For Filing Under Seal in Their Entireties

Pursuant to Civil Local Rules 7-11 and 79-5(b), Defendants respectfully hereby request leave of Court to file under seal in their entireties the following documents being lodged with the Clerk:

a. The Declaration of Winston Williams (Revised) in Support of Defendants
ConnectU LLC, Pacific Northwest Software, Inc., Winston Williams and Wayne Chang's Opposition
to Plaintiffs' Motion for Partial Summary Judgment ("Williams Declaration"). The Williams
Declaration contains discussions of and excerpts from the Declaration of Chris Shiflett in Support of
Plaintiffs. Partial Motion for Summary Judgment which the Plaintiffs' have asked to be sealed in its
entirety. It also contains discussions regarding ConnectU that are confidential, proprietary and
sensitive business information and should remain sealed from public viewing.

As required by Civil Local Rule 79-5(b), Defendants are lodging with the Clerk copies of theses documents which have been designated "Highly Confidential" and "Confidential" for filing under seal in their entirety.

1

28

11

# 

## SUPPORTING DECLARATION OF SCOTT R. MOSKO

I, Scott R. Mosko, declare as follows:

I am an attorney admitted to practice in the State of California and the United States
 District Court for the Northern District of California, and a partner of Finnegan, Henderson, Farabow,
 Garrett & Dunner, L.L.P., attorneys of record for Defendants ConnectU LLC, Pacific Northwest
 Software, Inc., Winston Williams and Wayne Chang. The matters referred to in this declaration are
 based on my personal knowledge and if called as a witness I could, and would, testify competently to
 those matters.

2. The representations made above in this Administrative Motion are true and correct to the best of my knowledge and belief.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that this declaration was executed this 14th day of February, 2008, at Palo Alto, California.

By:	/s/	
Scott R	Mosko	

1	[PROPOSED] ORDER			
2	Upon good cause shown, <b>IT IS HEREBY ORDERED</b> that the following documents shall be			
3	received and filed under seal in their entireties by the Clerk:			
4	1. The highlighted and unredacted version of Defendants ConnectU LLC, Pacific			
5	Northwest Software, Inc., Winston Williams and Wayne Chang's (Revised) Opposition to Plaintiffs'			
6	Motion for Partial Summary Judgment;			
7	2. The Declaration of Winston Williams (Revised) in Support of Defendants ConnectU			
8	LLC, Pacific Northwest Software, Inc., Winston Williams and Wayne Chang's Opposition to			
9	Plaintiffs' Motion for Partial Summary Judgment.			
10				
11	Dated:, 2008			
12	United States Magistrate Judge			
13				
14				
15				
16				
17				
18				
19				
20				
21				
22				
23				
24				
25				
26				
27				
28				
	Doc. No. 479384 DEFENDANTS' ADMINISTRATIVE MOTION AND [PROPOSED] 3 ORDER TO FILE DOCUMENTS UNDER SEAL Case No. 5:07-CV-01389-RS			

,#

\*