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CONNECTU, INC.

10
11 UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
12 SAN JOSE DIVISION

13 THE FACEBOOK, INC. and MARK
14 ZUCKERBERG,

15 Plaintiffs,

16 v.

17 CONNECTU, INC. (formerly known as
CONNECTU, LLC), PACIFIC NORTHWEST
18 SOFTWARE, INC., WINSTON WILLIAMS,
and WAYNE CHANG,

19 Defendants.
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CASE NO. 5:07-CV-01389-JW

**CONNECTU'S ADMINISTRATIVE
MOTION TO SEAL:**

**(1) CONNECTU, INC.'S OPPOSITION
TO FACEBOOK'S ADMINISTRATIVE
REQUEST FOR LEAVE TO FILE
REPLY TO, AND MOTION TO STRIKE
PORTIONS OF, CONNECTU'S
OPPOSITION TO PLAINTIFFS'
ADMINISTRATIVE REQUEST
PURSUANT TO CIVIL L.R. 7-11; AND**

**(2) [PROPOSED] ORDER DENYING
PLAINTIFFS' ADMIN REQUEST FOR
LEAVE TO FILE REPLY TO, AND
MOTION TO STRIKE PORTIONS OF,
CONNECTU'S OPPOSITION TO
PLAINTIFFS' ADMINISTRATIVE
REQUEST PURSUANT TO CIVIL L.R.
7-11.**

1 Pursuant to Civil L.R. 7-11 and 79-5(d), ConnectU respectfully submits this
2 administrative motion asking the Court to file under seal (1) ConnectU's Opposition To
3 Facebook's Administrative Request For Leave To File Reply To, And Motion To Strike Portions
4 Of, ConnectU's Opposition To Plaintiffs' Administrative Request Pursuant To Civil L.R. 7-11;
5 and (2) [Proposed] Order Denying Plaintiffs' Admin Request For Leave To File Reply To, And
6 Motion To Strike Portions Of, ConnectU's Opposition To Plaintiffs' Administrative Request
7 Pursuant To Civil L.R. 7-11.

9 The parties entered into, and the Superior Court of California, Superior County issued, a
10 Stipulated Protective Order on January 23, 2006, prohibiting either party from filing in the public
11 record any documents that have been designated as "Confidential" or "Highly Confidential"
12 pursuant to the protective order.

13 ConnectU's Opposition To Facebook's Administrative Request For Leave To File Reply
14 To, And Motion To Strike Portions Of, ConnectU's Opposition To Plaintiffs' Administrative
15 Request Pursuant To Civil L.R. 7-11 and documents filed in support thereof contain information
16 that Facebook has asserted is covered by the Protective Order and/or are alleged by Plaintiffs to
17 implicate confidentiality provisions found in a purported agreement which is the subject of
18 dispute between the parties.¹

19 ConnectU requests that its Opposition To Facebook's Administrative Request For Leave
20 To File Reply To, And Motion To Strike Portions Of, ConnectU's Opposition To Plaintiffs'
21 Administrative Request Pursuant To Civil L.R. 7-11 and documents filed in support thereof and
22 supporting papers remain sealed.

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27 ¹ By filing this request to seal, ConnectU does not waive any arguments or rights as to (i) the admissibility or
28 inadmissibility of evidence surrounding the purported agreement, (ii) the confidentiality or non-confidentiality of
information relating to the purported agreement, or (iii) the enforceability or unenforceability of the purported
agreement.

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4 Dated: May 20, 2008

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/s/ Steven C. Holtzman
Steven C. Holtzman

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