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9 Attorneys for Defendant
CONNECTU, INC.

10 UNITED STATES DISTRICT COURT
11 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, INC. AND MARK
ZUCKERBERG'S CONFIDENTIAL
MOTION TO ENFORCE
SETTLEMENT AGREEMENT;
(2) SECOND DECLARATION OF
EVAN A. PARKE IN SUPPORT
THEREOF;
(3) SUPPLEMENTAL
DECLARATION OF ROBERT T.
CLARKSON IN SUPPORT
THEREOF;
(4) DECLARATION OF ROBERT T.
CLARKSON IN SUPPORT THEREOF;
(5) DECLARATION OF CAMERON
WINKLEVOSS IN SUPPORT
THEREOF;
(6) CORRECTED DECLARATION
OF DONNA HITSCHERICH IN
SUPPORT THEREOF; AND
(7) [PROPOSED] ORDER DENYING
THE CONFIDENTIAL MOTION BY
THE FACEBOOK, INC. AND MARK
ZUCKERBERG TO ENFORCE A
PURPORTED SETTLEMENT
AGREEMENT

CONNECTU'S MOTION TO SEAL
5:07-CV-01389-JW

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, Inc.'s Opposition To
3 Facebook, Inc. And Mark Zuckerberg's Confidential Motion To Enforce Settlement Agreement;
4 (2) Second Declaration Of Evan A. Parke In Support Thereof; (3) Supplemental Declaration Of
5 Robert T. Clarkson In Support Thereof; (4) Declaration Of Robert T. Clarkson In Support
6 Thereof; (5) Declaration Of Cameron Winklevoss In Support Thereof; (6) Corrected
7 Declaration Of Donna Hitscherich In Support Thereof; And (7) [Proposed] Order Denying The
8 Confidential Motion By The Facebook, Inc. And Mark Zuckerberg To Enforce A Purported
9 Settlement Agreement.
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11 The parties entered into, and the Superior Court of California, Superior County issued, a
12 Stipulated Protective Order on January 23, 2006, prohibiting either party from filing in the public
13 record any documents that have been designated as "Confidential" or "Highly Confidential"
14 pursuant to the protective order.

15 ConnectU, Inc.'s Opposition To Facebook, Inc. And Mark Zuckerberg's Confidential
16 Motion To Enforce Settlement Agreement and documents filed in support thereof contain
17 information that Facebook has asserted is covered by the Protective Order and/or are alleged by
18 Plaintiffs to implicate confidentiality provisions found in a purported agreement which is the
19 subject of dispute between the parties.¹

20 ConnectU requests that its Opposition To Facebook, Inc. And Mark Zuckerberg's
21 Confidential Motion To Enforce Settlement Agreement and documents filed in support thereof
22 remain sealed.
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26 ¹ By filing this request to seal, ConnectU does not waive any arguments or rights as to (i) the admissibility or
27 inadmissibility of evidence surrounding the purported agreement, (ii) the confidentiality or non-confidentiality of
28 information relating to the purported agreement, or (iii) the enforceability or unenforceability of the purported
agreement.

1 Dated: June 2, 2008

2 /s/ Steven C. Holtzman

3 Steven C. Holtzman

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19 CONNECTU, INC.

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that this document(s) filed through the ECF system will be sent
3 electronically to the registered participants as identified on the Notice of Electronic Filing (NEF)
4 and paper copies will be sent to those indicated as non registered participants on June 2, 2008.
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6 Dated: June 2, 2008
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8 /s/ Steven C. Holtzman
9 Steven C. Holtzman
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