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GOOGLE INC.
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10
11 UNITED STATES DISTRICT COURT
12 NORTHERN DISTRICT OF CALIFORNIA
13 SAN JOSE DIVISION
14

15 JENNA GODDARD, on her own behalf and
on behalf of all others similarly situated,

16 Plaintiff,

17 v.

18 GOOGLE, INC., a Delaware corporation,
19 Defendant.
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CASE NO. C 08-02738 (JF)

**DECLARATION OF NIKKA N.
RAPKIN IN SUPPORT OF GOOGLE
INC.'S ADMINISTRATIVE
REQUEST TO FILE UNDER SEAL
(1) GOOGLE INC.'S
MEMORANDUM OF POINTS AND
AUTHORITIES IN OPPOSITION TO
PLAINTIFF'S MOTION TO
REMAND AND (2) THE
DECLARATION OF MATTHEW
HUDSON IN SUPPORT THEREOF**

Date: September 19, 2008

Time: 10:30 a.m.

Judge: The Honorable Jeremy Fogel

Date Action Filed: May 30, 2008

No Trial Date Set

1 I, Nikka N. Rapkin, hereby declare as follows:

2 1. I am an attorney licensed to practice law in the State of California. I am an
3 associate at Orrick, Herrington & Sutcliffe LLP, counsel of record to Defendant Google Inc.
4 ("Google") in this action.

5 2. Good cause exists to grant Google's administrative request to file under seal with
6 this Court: (1) Google's Memorandum of Points and Authorities in Opposition to Plaintiff's
7 Motion to Remand and (2) the Declaration of Matthew Hudson in support thereof.

8 3. Google's Memorandum of Points and Authorities in Opposition to Plaintiff's
9 Motion to Remand and the accompanying Declaration of Matthew Hudson contain highly
10 confidential and proprietary information concerning, among other things, details regarding
11 categories of certain Google advertisers, specific revenues generated by these advertisers over a
12 period of years, and Google's practices in running its business and in maintaining its internal
13 information and databases.

14 4. Although Google reports its revenue in public filings made available to the public
15 and its investors, it does not make available its revenue by specific segments of advertiser. Such
16 detailed information is confidential and proprietary to Google and releasing it to the public would
17 place Google at a competitive disadvantage. Similarly, information regarding Google's business
18 practices and internal operations is confidential and would cause Google harm if made publicly
19 available.

20 I declare under penalty of perjury that the foregoing is true and correct.

21 Executed August 29, 2008 at San Francisco, California

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24 Nikka N. Rapkin