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8 UNITED STATES DISTRICT COURT
 9 NORTHERN DISTRICT OF CALIFORNIA
 10 SAN FRANCISCO DIVISION
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12 SYNOPSISYS, INC., a Delaware corporation,
 13 Plaintiff and Counter-Defendant,
 14 v.
 15 MAGMA DESIGN AUTOMATION, a
 Delaware corporation,
 16 Defendant and Counter-Claimant.
 17

Case No. C-04-03923 MMC (JCS)

**PLAINTIFF SYNOPSISYS, INC.’S
 ADMINISTRATIVE MOTION TO FILE
 DOCUMENTS UNDER SEAL PURSUANT
 TO CIVIL LOCAL RULES 7-11 AND 79-5
 RELATING TO OPENING CLAIM
 CONSTRUCTION BRIEF**

18 AND RELATED CROSS-ACTIONS.
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1 Plaintiff Synopsys, Inc. (“Synopsys”) hereby requests, pursuant to Civil Local Rules 7-11
2 and 79-5, an Order sealing the following documents lodged with the Court in connection with
3 Synopsys’ Opening Claim Construction Brief:

4 1. Synopsys’ Opening Claim Construction Brief, at 7:25-8:5, 16:8-14, 21:10-18
5 contains information cited and quoted from documents that have been designated by the parties
6 and are simultaneously being lodged under seal.

7 2. The Declaration of Michael N. Edelman In Support Of Plaintiff Synopsys’ Opening
8 Claim Construction Brief (the “Edelman Declaration”), at Paragraphs 5 and 14 contains
9 information summarized and/or quoted from documents that have been designated by the parties
10 and are simultaneously being lodged under seal.

11 3. Exhibit D to the Edelman Declaration contains a letter from David A. Jakopin from
12 the Pillsbury law firm to Elizabeth Roemer, Magma’s in-house counsel, bearing Bates number
13 MAGMA0068232. Although Synopsys disagrees that this document contains confidential
14 information, Magma has designated the document “Attorneys and Consultants Only.” For this
15 reason Synopsys requests that the document be filed under seal.

16 4. Exhibit E to the Edelman Declaration is an email from David A. Jakopin to Lukas
17 van Ginneken, bearing Bates number MAGMA0067270. Although Synopsys disagrees that this
18 document contains confidential information, Magma has designated the document “Attorneys and
19 Consultants Only.”

20 5. Exhibit N to the Edelman Declaration is an email chain between David A. Jakopin
21 and Lukas van Ginneken, bearing Bates number MAGMA0067271-MAGMA0067271.2.
22 Although Synopsys disagrees this document contains any confidential information, Magma has
23 designated it “Attorneys and Consultants Only.” Accordingly, Synopsys respectfully requests
24 that this document be filed under seal.

25 6. The Declaration of David Harris In Support Of Plaintiff Synopsys’ Opening Claim
26 Construction Brief (the “Harris Declaration”), at Paragraphs 86 and 87 contains information
27 summarized and/or quoted from documents that have been designated by the parties and are
28 simultaneously being lodged under seal.

1 7. Exhibit S to the Harris Declaration is a document entitled “Physical Design
2 Strategy” bearing Bates number MAGMA0123415-MAGMA0123432. Magma has designated
3 the document “Confidential – Attorneys and Consultants Only.” For this reason, Synopsys
4 respectfully requests that it be filed under seal.

5 8. Exhibit T to the Harris Declaration is a document entitled “Methodology Plan”
6 bearing Bates number MAGMA0123222-MAGMA0123251. Magma has designated the
7 document “Confidential – Attorneys and Consultants Only.” For this reason, Synopsys
8 respectfully requests that it be filed under seal.

9 9. Exhibit U to the Harris Declaration is a document entitled “Bucket Equalization”
10 bearing Bates number MAGMA0140192-MAGMA0140197. Magma has designated the
11 document “Confidential – Attorneys and Consultants Only.” For this reason, Synopsys
12 respectfully requests that it be filed under seal.

13 For the foregoing reasons, Synopsys respectfully requests that the Court grant this motion
14 to seal the above referenced document containing information that Synopsys and Magma claim is
15 highly sensitive business confidential and/or proprietary information. Synopsys and Magma have
16 an overriding interest in protecting the disclosure of this allegedly sensitive and confidential
17 information.

18 The sealing of the aforementioned documents is appropriate under Local Rule 79-5. A
19 substantial probability exists that the overriding interest will be prejudiced if the records are not
20 sealed. The proposed sealing is narrowly tailored (Synopsys seeks a narrowly tailored order to
21 have sealed only those documents separately lodged with this Court for which sealing is
22 appropriate). There are no less restrictive means to achieve the overriding interest.

23 A Proposed Order is being filed and served herewith.

24 Dated: July 7, 2005

DECHERT LLP

25
26 By: /s/ Michael N. Edelman

27 Chris Scott Graham
28 Michael N. Edelman
Attorneys for Plaintiff and Counter-Defendant,
SYNOPSIS, INC.