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12 Attorneys for Plaintiffs  
 13 INTERSERVE, INC., dba TECHCRUNCH  
 14 and CRUNCHPAD, INC.

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 17 **UNITED STATES DISTRICT COURT**  
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 19 **NORTHERN DISTRICT OF CALIFORNIA**

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 San Francisco, CA 94111-5802

13 **INTERSERVE, INC., dba TECHCRUNCH, )**  
 14 **a Delaware corporation, and CRUNCHPAD, )**  
 15 **INC., a Delaware corporation, )**  
 16 **Plaintiffs, )**  
 17 **vs. )**  
 18 **FUSION GARAGE PTE. LTD., a Singapore )**  
 19 **company, )**  
 20 **Defendant. )**

Case No. CV-09-5812 RS (PVT)

**DECLARATION OF DAVID S. BLOCH IN  
 SUPPORT OF MOTION TO SEAL (RE  
 DEFENDANT'S PRELIMINARY  
 INJUNCTION OPPOSITION PAPERS)**

1 I, David S. Bloch, declare pursuant to 28 U.S.C. § 1746:

2 1. I am an attorney at law duly licensed to practice before all the courts of the State of  
3 California and before the United States District Court for the Northern District of California. I am a  
4 partner at Winston & Strawn LLP, counsel of record for Plaintiffs Interserve, Inc. dba TechCrunch  
5 and CrunchPad, Inc.

6 2. I have reviewed the materials that Defendant includes or discusses in its opposition to  
7 Plaintiffs' motion for preliminary injunction, that Defendant seeks to file under seal, and that  
8 Plaintiffs have previously designated as "Confidential" or "Highly Confidential" under the  
9 Protective Order in the case.

10 3. The following material should be filed under seal:

11 a. Pages 263 to 272; 281 (lines 16-21); 351 (lines 11-25); and 388 (line 18) to  
12 390 (line 12) of the transcript of the deposition testimony given by Michael Arrington, the  
13 founder, co-editor, and principal of Plaintiff Interserve, Inc. dba TechCrunch and CEO of  
14 Plaintiff CrunchPad, Inc., on April 20, 2010, which is Exhibit A to the Declaration of Patrick  
15 Doolittle;

16 b. Exhibit B to the Declaration of Patrick Doolittle; and

17 c. Exhibit C to the Declaration of Patrick Doolittle.

18 4. Mr. Arrington has indicated to me that this material contains highly sensitive  
19 information about Plaintiffs' internal operations (including personnel management), Plaintiffs'  
20 financials, and Plaintiffs' business plans; and that disclosure of this information would cause  
21 Plaintiffs serious competitive harm if openly included or discussed in papers filed publicly with the  
22 Court.

23 5. Plaintiffs provisionally designated under the protective order the entirety of Exhibit A  
24 to the Declaration of Patrick Doolittle, the transcript of deposition testimony Mr. Arrington gave on  
25 April 20, 2010, to give Plaintiffs time to review all 390 pages of the transcript to make proper  
26 designations. Plaintiffs will communicate final designations of the transcript to Defendant on or  
27 before May 6, 2010.

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