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Attorneys for Defendants
Rockstar Consortium U.S. LP and
MobileStar Technologies LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND

Google, Inc.)
)
Plaintiff,)
)
vs.)
)
Rockstar Consortium U.S. LP and MobileStar)
Technologies LLC)
)
Defendants.)
)
_____)

Case No. 13-cv-5933
HON. CLAUDIA WILKEN
**DEFENDANTS ROCKSTAR
CONSORTIUM U.S. LP AND
MOBILESTAR TECHNOLOGIES
LLC'S ADMINISTRATIVE
MOTION TO FILE UNDER SEAL**

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TO PLAINTIFF GOOGLE, INC. AND ITS COUNSEL OF RECORD:

PLEASE TAKE NOTICE THAT Pursuant to Civil Local Rules 7-11 and 79-5, Defendants Rockstar Consortium U.S. LP (“Rockstar”) and MobileStar Technologies LLC (“MobileStar”) submit a request for an order instructing the Clerk to file under seal certain portions of Defendants’ Reply to Google Inc.’s Opposition to Defendants’ Motion to Dismiss and to Decline Exercising Jurisdiction Under the Declaratory Judgment Act (“Reply”).

Defendant’s Reply discusses licensing meetings between Rockstar, MobileStar and other parties. Rockstar and MobileStar executed non-disclosure agreements prior to entering into these meetings, and the agreements cover the existence of licensing meetings between the parties. Details of Rockstar and MobileStar’s licensing negotiations with others, including identities of parties currently negotiating with the Defendants, is sensitive confidential and proprietary business information relevant to Rockstar and MobileStar’s licensing and business strategies. As such, Defendants and third parties will be harmed by disclosure of this information.

On these grounds, Defendants Rockstar and MobileStar request the Court to seal the portions of the Reply document containing confidential and proprietary business information. This request is narrowly tailored to seal only that material for which good cause to seal has been established. A Proposed Order granting this Administrative Motion has been filed and served herewith.

Respectfully submitted,

Dated this 13th day of February, 2014.

By: /s Courtland Reichman
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Mike McKool (Pro Hac Vice Application to be filed)

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MobileStar Technologies LLC**