Goog	e Inc.v. Rockst	ar ConsortiuDmodU.S
1 2 3 4 5 6 7 8 9	Courtland L. Reichman (SBN 268873) creichman@mckoolsmithhennigan.com McKool Smith Hennigan, P.C. 255 Shoreline Drive Suite 510 Redwood Shores, CA 94065 (650) 394-1400 (650) 394-1422 (facsimile) Mike McKool (Pro Hac Vice Application Pending Douglas A. Cawley (Admitted Pro Hac Vice) Ted Stevenson III (Admitted Pro Hac Vice) David Sochia (Admitted Pro Hac Vice) McKool Smith, P.C. 300 Crescent Court, Suite 1500 Dallas, TX 75201 (214) 978-4000 (214) 978-4044 (facsimile)	g)
10	Attorneys for Defendants	
11	Rockstar Consortium U.S. LP and MobileStar Technologies LLC	
12	UNITED STATES DISTRICT COURT	
13	NORTHERN DISTRICT OF CALIFORNIA	
14 15	OAKLAND	
15	Google, Inc.	
10	Plaintiff,) Case No. 13-cv-5933
18	vs.) HON. CLAUDIA WILKEN
19	Rockstar Consortium U.S. LP and MobileStar Technologies LLC) [PROPOSED] ORDER TO SEAL DOCUMENTS FILED IN SUPPORT
20	Defendants.	OF DEFENDANT'S REPLY TO GOOGLE'S OPPOSITION TO
21		PLAINTIFF'S MOTION TO DISMISS AND TO DECLINE
22) EXERCISING JURISDICTION) UNDER THE DECLARATORY
23		JUDGMENT ACT
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	13-CV-05933 [PROPOSED] Order to Seal Doc	cuments Filed in Support of Defendant's Reply
		Docket

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TO ALL PARTIES HEREIN:

The Court has read and considered Defendants Rockstar Consortium U.S. LP and MobileStar Technologies LLC's Administrative Motion for a Sealing Order in Support of Its Opposition to Defendant's Motion to Dismiss or Transfer ("Reply"), pursuant to Local Rules 79-5 and 7-11, to file selected documents comprised of highly sensitive information regarding Rockstar Consortium U.S. LP and MobileStar Technologies LLC's (collectively, "Defendants") private negotiations and trade secrets.

Defendants' interest in protecting information concerning private negotiations and trade secrets overcomes the right of public access to these records, and is good cause to support the sealing of the records. If the records are not sealed, there is a substantial probability that Defendants' interests in the confidential information and trade secrets will be prejudiced. The sealing is narrowly tailored in that it is limited only to those documents containing such information. Good cause appearing therefor, this Court finds pursuant to Civil L.R. 79-5, that: (1) The documents to be sealed, or portions thereof, are entitled to protection under the law, that overcomes the right of public access to the record; and (2)The proposed sealing is narrowly tailored. IT IS ORDERED THAT the Motion (1) to seal the highly confidential information contained in the Defendants' Reply to Google's Opposition to Plaintff's Motion to Dismiss and to Decline Exercising Jurisdiction Under the Declaratory Judgment Act is GRANTED and that those documents and portions of documents are hereby ordered to be filed under seal. DATED: Hon. Claudia Wilken UNITED STATES DISTRICT JUDGE 20 27 28 -2-[PROPOSED] Order to Seal Documents Filed in Support of Defendant's Reply 13-CV-05933