MOTION TO WITHDRAW PLAINTIFF DAVID SHADPOUR WITHOUT PREJUDICE UNDER SEAL

Case No. C 13-05996 PJH (MEJ)

Campbell et al v. Facebook Inc.

Doc. 102

Pursuant to Civil Local Rules 7-11 and 79-5(b)-(d), and the Stipulated Protective Order that was entered by the Court on April 17, 2015 (Dkt. No. 76), Defendant Facebook, Inc. ("Facebook") files this administrative motion to seal documents submitted in connection with its Opposition to Plaintiffs' Motion to Withdraw Plaintiff David Shadpour Without Prejudice. Specifically, Facebook is lodging the following document under seal that Plaintiffs have designated as "Highly Confidential – Attorneys' Eyes Only" in its entirety pursuant to the Stipulated Protective Order:

• Plaintiff David Shadpour's Corrected Objections and Responses to Facebook's First Set of Interrogatories, which is attached as Exhibit 5 to the Declaration of Christopher Chorba In Support of Facebook's Opposition brief.

Plaintiffs have designated the entirety of Mr. Shadpour's Interrogatory Responses as "Highly Confidential – Attorneys' Eyes Only" pursuant to the parties' Stipulated Protective Order, and so Facebook has redacted the entirety of those responses in its submission. Further, these responses do contain Mr. Shadpour's email addresses, usernames, and other personal information.

Accordingly, Facebook requests that the Court order that Shadpour's Interrogatory Responses be filed under seal.

Attorneys for Defendant FACEBOOK, INC.

Dated: July 27, 2015	Respectfully submitted,
	GIBSON, DUNN & CRUTCHER LLP
	By:/s/ Christopher Chorba
	Christopher Chorba