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LAW, LLP

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN JOSE DIVISION**

ZURVAN MAHAMEDI and MAHAMEDI IP  
LAW, LLP,

Plaintiffs,

v.

WILLIAM PARADICE,

Defendant.

**CASE NO. 16-cv-2805 EJD**

**STIPULATION RE:  
ADMINISTRATIVE MOTION TO  
SEAL (Dkt. No. 89)**

Courtroom 4  
Judge Edward J. Davila

Pursuant to Civ. L.R. 79-5(e), the parties in this case, Plaintiffs Zurvan Mahamedi and Mahamedi IP Law, LLP (together, the “Plaintiffs”), and Defendant William Paradice (“Paradice”) stipulate as follows:

WHEREAS Plaintiffs filed an administrative motion at Dkt. No. 84 seeking a clarification of the Court’s order at Dkt. No. 69;

WHEREAS Paradice filed an opposition to Plaintiffs’ clarification motion, at Dkt. No. 90;

WHEREAS Paradice’s opposition included a motion to file certain documents under seal

1 - specifically: (a) a document referred to by Plaintiffs as the “RTU Email”, and attached as  
2 Exhibit B to the Declaration of Brian Mitchell (filed under seal at Dkt. No. 90-3), and (b) a second  
3 document consisting of an email dated March 6, 2016, and attached as Exhibit C to the  
4 Declaration of Brian Mitchell (filed under seal at Dkt. No. 90-4) (together, the “Subject  
5 Documents”);

6 WHEREAS the Subject Documents were designated as “confidential” by Plaintiffs;

7 WHEREAS Plaintiffs originally filed the March 6, 2016 email as an exhibit to the  
8 Declaration of Zurvan Mahamedi in Support of Plaintiffs’ Motion for Clarification (at Dkt. No. 87-  
9 2) with significant redactions;

10 WHEREAS the parties have resolved a dispute regarding the appropriate amount of redaction  
11 for the March 6, 2016 email;

12 WHEREAS the parties agree that the redactions set forth in the accompanying Exhibit A  
13 strike a compromise between the parties for the purpose of fairly prosecuting and defending the case,  
14 while respecting the public interest in transparency;

15 NOW THEREFORE, the parties respectfully request that the Court seal Dkt. No. 90-4, and  
16 approve the redactions set forth in the accompanying Exhibit A as the publicly available version of  
17 Dkt. No. 90-4. In the event that the Court is inclined not to so seal the Dkt. No. 90-4, the parties  
18 request that the Court allow seven days after such an order to allow the clients that may be affected  
19 by such an order to file papers, if any, in support of sealing the Subject Documents.

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21 IT IS SO STIPULATED.  
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1 Dated: April 4, 2017

Respectfully submitted,

2 LEXANALYTICA, PC

3 By /s/ Perry J. Narancic  
4 LEXANALYTICA, PC  
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10 Attorneys for Plaintiffs  
11 ZURVAN MAHAMEDI and MAHAMEDI  
12 IP LAW, LLP

13 /s/ Brian Mitchell  
14 Mitchell + Company  
15 4 Embarcadero Center, Suite 1400  
16 San Francisco, CA 94111  
17 Tel: 415-766-3514

18 Attorney for Defendant  
19 WILLIAM PARADICE

20 **Attestation**

21 Pursuant to Civil L.R. 5-1(i)(3), I attest that concurrence in the filing of this document has  
22 been obtained from each of the other signatories to this document.

23 Dated: April 4, 2017

24 By: /s/ Perry J. Narancic

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**[PROPOSED] ORDER**

GOOD CAUSE appearing therefore, and having considered the stipulation of the parties and the Declaration of Zurvan Mahamedi in Support of the Administrative Motion to Seal at Dkt. No. 89, the Administrative Motion to Seal is GRANTED, and Paradise shall file, as the public version of Dkt. No. 90-4, the redacted document filed as Exhibit A to the parties' stipulation.

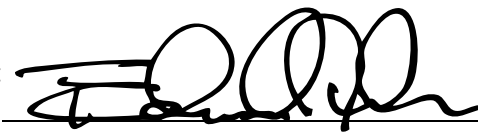
OR

~~GOOD CAUSE appearing therefore, and having considered the stipulation of the parties and the Declaration of Zurvan Mahamedi in Support of the Administrative Motion to Seal at Dkt. No. 87, the Administrative Motion to Seal is DENIED. This order shall be stayed for 7 days following entry hereof, to allow the clients that may be affected by this order to file supplemental papers, if any, in support of reconsideration of this order.~~

IT IS SO ORDERED.

DATE: June 30, 2017

By:



Hon. Edward J. Davila  
United States District Judge