

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

LEADER TECHNOLOGIES, INC., a
Delaware corporation,

Plaintiff-Counterdefendant,

v.

FACEBOOK, INC., a Delaware corporation,

Defendant-Counterclaimant.

Civil Action No. 08-862-JJF/LPS

**DEFENDANT FACEBOOK, INC.'S MOTION FOR
REDACTION OF ELECTRONIC TRANSCRIPT OF HEARING ON APRIL 9, 2010**

I. BACKGROUND

On April 9, 2010 Magistrate Judge Stark held a hearing via teleconference to address several ongoing discovery disputes between the parties to this litigation. The parties each filed letter briefs under seal with Judge Stark regarding these various disputes prior to the hearing. Public redacted versions of the letter briefs have since been filed. During the teleconference, confidential and proprietary information regarding Defendant Facebook was discussed. The parties discussed non-public proprietary business information related to the development of Facebook's website.

II. RELIEF REQUESTED

By this request Facebook respectfully requests that the Court redact the confidential testimony contained in the electronic transcript of the hearing held on April 9, 2010 and thereafter (i) make available to the public an appropriately redacted version of the transcript, consistent with the proposed redactions listed in Exhibit A hereto; and (ii) direct that the full and

sealed version of the transcript be made available only to (a) the Court and (b) the parties to this litigation.

III. BASIS FOR RELIEF

A Stipulated Protective Order was entered by the Court in this matter on April 28, 2009. (D.I. 35). Pursuant to its terms, the parties may designate as confidential non-public confidential and/or propriety information protectable under Rule 26(c) of the Federal Rules of Civil Procedure. Furthermore, information designated as confidential may be disseminated only to a specifically designated set of persons. Pursuant to these terms, the parties have worked diligently to maintain the confidential nature of their respective proprietary information. Consistent with this effort the parties have filed redacted versions of all documents containing confidential information submitted to this Court. The hearing on April 9, 2010 included discussion of the confidential matters raised in the briefs submitted to the court, and for which public redacted versions were filed. This included discussion of non-public, proprietary business information related to the development of Facebook's website. Accordingly, that same information protected as confidential as between the parties in their briefs should also be protected as confidential in the transcript of the hearing on those matters on April 9, 2010.

IV. CONCLUSION

For all the reasons stated above, Facebook respectfully requests that the Court grant its Motion For Redaction of the Electronic Transcript of the Hearing on April 9, 2010.

Dated: May 7, 2010

BLANK ROME LLP

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