

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

LEADER TECHNOLOGIES, INC., a Delaware corporation,)	
)	
Plaintiff-Counterdefendant,)	Civil Action No. 08-862-JJF/LPS
)	
v.)	
)	
FACEBOOK, INC., a Delaware corporation,)	
)	
Defendant-Counterclaimant.)	

**LEADER TECHNOLOGIES, INC.'S OPPOSITION TO FACEBOOK INC.'S
MOTION FOR REDACTION OF HEARING ON APRIL 9, 2010**

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Dated: May 21, 2010

I. BACKGROUND

On May 7, 2010, Facebook filed a motion to redact portions of the electronic transcript of the hearing held on April 9, 2010. Facebook claims that during the April 9, 2010 teleconference, confidential and proprietary information regarding Facebook was discussed. D.I. 377. Specifically, Facebook claims that the parties discussed non-public proprietary business information related to the development of Facebook's website. *Id.*

II. RELIEF REQUESTED

Leader respectfully requests that the Court deny Facebook's motion for redaction of the electronic transcript of the hearing on April 9, 2010.

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 *only* non-public confidential and/or proprietary information protectable under Rule 26(c) of the Federal Rules of Civil Procedure. Facebook's list of proposed redactions of the transcript does not refer to any confidential information, but only refers to discussions regarding Leader's right to take the deposition of Mr. Zuckerberg. *See* D.I. 377, Ex. A. The information discussed did not contain non-public, proprietary business information related to the development of Facebook's website. As such, this information is not confidential and should not be redacted from the public record.

IV. CONCLUSION

Leader respectfully requests that the Court deny Facebook's Motion For Redaction of the Electronic Transcript of the Hearing on April 9, 2010.

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CERTIFICATE OF SERVICE

I, Philip A. Rovner, hereby certify that on May 21, 2010, the within document was filed with the Clerk of the Court using CM/ECF which will send notification of such filing(s) to the following; that the document was served on the following counsel as indicated; and that the document is available for viewing and downloading from CM/ECF.

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