

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 REPLY IN SUPPORT OF MOTION FOR
REDACTION OF ELECTRONIC TRANSCRIPT OF HEARING ON APRIL 9, 2010**

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Dated: June 1, 2010

Facebook Inc. (“Facebook”) submits this reply brief to address Leader Technology, Inc.’s (“LTI’s”) inexplicable opposition to Facebook’s request to redact confidential information discussed during the teleconference with Judge Stark, held on April 9, 2010. The requested redactions are appropriate despite Leader’s conclusory assertions to the contrary.

The Stipulated Protective Order entered by the Court in this matter on April 28, 2009 (D.I. 35) allows the parties to designate as confidential, material that is non-public confidential and/or propriety information, protectable under Rule 26(c) of the Federal Rules of Civil Procedure. The April 9 teleconference included discussion of confidential information related to, among other things, the development of Facebook’s website. *See, e.g.*, D.I. 344, Teleconference Hearing Transcript of April 9, 2010 at 11:7-20. Facebook has accordingly sought to protect the information it considers confidential by requesting redaction, and LTI’s opposition includes no justification for denying Facebook’s request. Facebook therefore respectfully requests that this Court grant Facebook’s motion for redaction.

Dated: June 1, 2010

By: /s/ Steven L. Caponi
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