

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-LPS

**DEFENDANT FACEBOOK, INC.'S REPLY IN SUPPORT OF ITS MOTION FOR  
REDACTION OF ELECTRONIC TRANSCRIPT OF THE MARCH 12, 2010 HEARING**

**I. REPLY**

Judge Stark presided over a discovery hearing in the above referenced matter on March 12, 2010. During this hearing highly confidential and proprietary information regarding Defendant Facebook was discussed. Leader has opposed Facebook's Motion to Redact the transcript of this hearing on the basis that the discussions therein reveal neither the source code nor the actual contents of internal Facebook documents. Leader's view of the contents of the discussion, however, is oversimplified. Leader disregards the confidential and proprietary nature of the methods underlying Facebook's operation, beyond just the specific code that runs the website. Indeed the transcript contains discussion of the structure of the Facebook source code and method of preservation of that code, the means by which engineers relate and share information about the code, as well as references to specific projects related to the website. *See, e.g.* Transcript of Hearing of March 12, 2010 at 52:15-53:3. Accordingly, this information should be redacted in the transcript of the hearing.

**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 held on March 12, 2010.

Dated: January 7, 2011

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