

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

TIMELINES, INC.)	
)	
Plaintiff,)	
)	
v.)	Civil Action No.: 11 CV 6867
)	
FACEBOOK, INC.)	HONORABLE JOHN W. DARRAH
)	
Defendant.)	

**DEFENDANT FACEBOOK, INC.’S MOTION FOR LEAVE TO FILE UNDER SEAL AN
EXCERPT FROM THE RULE 30(b)(6) DEPOSITION OF FACEBOOK, INC. &
PLAINTIFF’S FINANCIAL DOCUMENT**

Pursuant to Local Rule 26.2, Defendant Facebook, Inc. (“Facebook”) hereby moves this Court for leave to file under seal an excerpt from the Rule 30(b)(6) deposition transcript of Facebook (86:17-87:2) and a financial document (Bates Nos. T0000001-08) produced by Plaintiff Timelines, Inc. Facebook has included both documents as exhibits in support of its simultaneously-filed summary judgment motion.

Pursuant to the Protective Order entered in this case, proprietary or confidential information, designated as “Confidential” or “Highly Confidential – Outside Counsel Only,” may be filed under seal. *See* Dkt. No. 5 at ¶¶ 4, 5. Both the deposition excerpt and the financial document contain sensitive information that should not be disclosed publicly. The parties designated both documents accordingly. Facebook respectfully requests that this Court grant Facebook’s motion for leave to file under seal the two documents in support of its summary judgment motion.

Dated: January 31, 2013

Respectfully submitted,

COOLEY LLP

By: /s/ Brendan J. Hughes
Peter J. Willsey (*pro hac vice*)
Brendan Hughes (*pro hac vice*)
1229 Pennsylvania Ave., NW, Suite 700
Washington, DC 20004
Tel: (202) 842-7800
Fax: (202) 842-7899
Email: pwillsey@cooley.com
bhughes@cooley.com

Michael G. Rhodes (*pro hac vice*)
101 California Street, 5th Floor
San Francisco, CA 94111-5800
Tel: (415) 693-2000
Fax: (415) 693-2222
Email: rhodesmg@cooley.com

Steven D. McCormick (#1824260)
KIRKLAND & ELLIS LLP
300 North LaSalle
Chicago, IL 60654-3406
Tel: (312) 862-2000
Fax: (312) 862-2200
Email: smccormick@kirkland.com

Counsel for Facebook, Inc.

CERTIFICATE OF SERVICE

The undersigned, an attorney, hereby certifies that he served the foregoing **DEFENDANT FACEBOOK, INC.'S MOTION FOR LEAVE TO FILE UNDER SEAL AN EXCERPT FROM THE RULE 30(b)(6) DEPOSITION OF FACEBOOK, INC. & PLAINTIFF'S FINANCIAL DOCUMENT** by means of the Court's CM/ECF System, which causes a true and correct copy of the same to be served electronically on all CM/ECF registered counsel of record, on January 31, 2013.

Dated: January 31, 2013

/s/ Brendan J. Hughes

Brendan J. Hughes (*pro hac vice*)

COOLEY LLP

1229 Pennsylvania Ave., NW, Suite 700

Washington, DC 20004

Tel: (202) 842-7800

Fax: (202) 842-7899

Email: bhughes@cooley.com

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