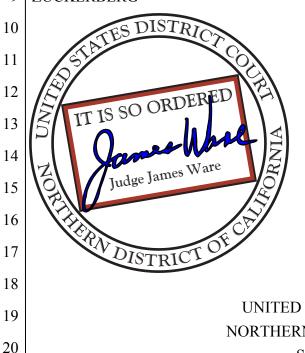
EXHIBIT B

Dockets.Justia.com

- 1 I. NEEL CHATTERJEE (State Bar No. 173985) nchatterjee@orrick.com
- 2 MONTE COOPER (State Bar No. 196746) mcooper@orrick.com
- 3 THERESA A. SUTTON (State Bar No. 211857) tsutton@orrick.com
- YVONNE P. GREER (State Bar No. 214072) 4 ygreer@orrick.com
- 5 ORŔĬCK, HERRINGTON & SUTCLIFFE LLP 1000 Marsh Road
- 6 Menlo Park, CA 94025 Telephone: 650-614-7400
- 7 Facsimile: 650-614-7401
- 8 Attorneys for Plaintiffs THE FÁCEBOOK, INC. and MARK 9 ZUCKERBERG



CONNECTU, INC. (formerly known as

CONNECTU, LLC), PACIFIC NORTHWEST

SOFTWARE, INC., WINSTON WILLIAMS,

Plaintiffs.

Defendants.

STEVEN C. HOLTZMAN (State Bar No. 144177) sholtzman@bsfllp.com BOIES SCHILLER & FLEXNER LLP 1999 Harrison Street, Suite 900 Oakland, CA 94612 Telephone: (510) 874-1000 Facsimile: (510) 874-1460

D. MICHAEL UNDERHILL (pro hac vice) munderhill@bsfllp.com BOIES SCHILLER & FLEXNER LLP 5301 Wisconsin Avenue NW Washington, D.C. 20015 Telephone: (202) 237-2727 Facsimile: (202) 237-6131

Attorneys for Defendant CONNECTU, INC.

SCOTT R. MOSKO (State Bar No. 106070) scott.mosko@finnegan.com FINNEGAN, HENDERSON, FARABOW, GARRETT & DUNNER, L.L.P. Stanford Research Park 3300 Hillview Avenue Palo Alto, California 94304 Telephone: (650) 849-6600 Facsimile: (650) 849-6666

Attorneys for Defendants WAYNE CHANG, WINSTON WILLIAMS, PACIFIC NORTHWEST SOFTWARE, INC., and CONNECTU, INC.

UNITED S	STATES DISTRICT COURT
NORTHERN	DISTRICT OF CALIFORNIA
SA	AN JOSE DIVISION
THE FACEBOOK, INC. and MARK ZUCKERBERG	Case No. 5:07-CV-01389-JW

[JOINT PROPOSED] ORDER RE SEALING MOTIONS

ZUCKERBERG.

V.

and WAYNE CHANG,

21

22

23

24

25

26

27

28

Pursuant to the Court's May 27, 2008, Order Re Sealing Motions, plaintiffs The Facebook, Inc. and Mark Zuckerberg ("Facebook") and defendants ConnectU, Inc., Pacific Northwest Software, Wayne Chang, and Winston Williams submit the following summary of motions brought pursuant to Civil Local Rule 79-5(d), which are currently pending.

5 7 8 9	(1) Identity of each sealing motion by docket number and caption	(2) Declarations in support of the sealing requested	(3) Documents and exhibits to be sealed	(4) Documents and Exhibits that designating party withdraws its designation	(5) Whether motion to seal is opposed
)	Dkt#: 246		<u>Dkt. #: 245</u>		Unopposed
1 2 2 3 3 4 4 5 5 5 7 7 3 3 9	Caption: Plaintiffs' Motion To Seal Exhibits K, L-1, And M-1 To The Declaration Of Theresa Sutton In Support Of Plaintiffs' Response To Finnegan's Motion To Withdraw As Counsel For Defendant Winston Williams	No declaration filed by defendants in support has been filed for Exhibits K, L-1, M-1 to the Declaration of Theresa Sutton in Support of Plaintiffs' Response to Finnegan's Motion to Withdraw as Counsel for Defendant Winston Williams	Exhibits K, L-1, M-1 to the Declaration of Theresa Sutton in Support of Plaintiffs' Response to Finnegan's Motion to Withdraw as Counsel for Defendant Winston Williams		
)	<u>Dkt#: 255</u>	<u>Dkt. #: 256</u>	<u>Dkt. #: 251</u>		Unopposed
	Caption: Plaintiffs' Motion To Seal Portions Of Their Motion For Partial Summary Judgment Re Defendants' Liability Pursuant To California Penal Code Section 502(c) and 15 U.S.C. § 7704(a)(1) and 15 U.S.C. § 7704(b)(1), The Declaration Of Chris Shiflett In Support Thereof	• Declaration of Theresa A. Sutton in Support of Plaintiffs' Motion to Seal Portions of Their Motion for Partial Summary Judgment;, Declaration of Chris Shiflett, Exhibits 1, 2, 3 to the Declaration of	 Motion for Partial Summary Judgment Re Defendants' Liability Pursuant to California Penal Code Section 502(c) and 15 U.S.C. § 7704(a)(1) and 15 U.S.C. § 7704(b)(1) <u>Dkt. #: 253</u> Declaration of Chris Shiflett in Support Exhibit 1, 2, 3, 4, 5, 6, to the Declaration of 		

1

2

3

4

5

(1) Identity of each sealing motion by docket number and caption	(2) Declarations in support of the sealing requested	(3) Documents and exhibits to be sealed	(4) Documents and Exhibits that designating party withdraws its designation	(5) Whether motion to seal is opposed
Including Exhibits 1-3; And Exhibits 1,	Chris Shiflett, Exhibits 1, 2, 4	Chris Shiflett in Support		
2, And 4 To The Declaration Of Monte M.F. Cooper	to Declaration of the Monte M.F. Cooper in	Dkt. #: 252 • Exhibits 1, 2, 4, 6-7, 10-12, 28-34, 36-38, 40-		
In Support Thereof	Support	43, 45-48, 50-55, 57-59, 61, 63-64 to the		
	• No declaration filed by defendants in	Declaration of Monte M.F. Cooper		
	support of Exhibits 4, 5, 6,			
	to the Declaration of Chris Shiflett in			
	Support and Exhibits 6-7, 10-			
	12, 28-34, 36-38, 40-43, 45-48, 50-55, 57-59, 61,			
	63-64 to the Declaration of			
DI 4// 274	Monte M.F. Cooper	DI 4 // 255		T T
<u>Dkt#: 274</u>		<u>Dkt. #: 275</u>		Unopposed
Caption: Plaintiffs' Motion To Seal Portions Of Their	No declaration filed by defendants in	• Motion to Compel Compliance by Defendants Pacific		
Motion To Compel Compliance By	support of all documents and	Northwest Software and Winston Williams with		
Defendants Pacific Northwest Software And Winston	exhibits to seal has been filed.	Order Granting Motion to Compel Supplemental Interrogatory Responses		
Williams With Order Granting		<u>Dkt. #: 272</u>		
Motion To Compel Supplemental Interrogatory		• Exhibits 3-6, 9, 11- 13, to the Declaration of Monte M.F. Cooper		
Responses; And Exhibits 3-6, 9 And		in Support		
11-13 To The Declaration Of Monte M.F. Cooper		 <u>Dkt. #: 273</u> Declaration of Chris Shiflett and Exhibits 		
In Support Thereof; And The Declaration		1, 1A, 2, 3 to the Declaration of Chris		
Of Chris Shiflett In Support Thereof		Shiflett		

(1) Identity of each sealing motion by docket number and caption	(2) Declarations in support of the sealing requested	(3) Documents and exhibits to be sealed	(4) Documents and Exhibits that designating party withdraws its designation	(5) Whether motion to seal is opposed
Including Exhibits 1, 1A, 2-3				
<u>Dkt#: 302</u>		<u>Dkt. #: 292</u>		Unopposed
Caption : "Defendants' Administrative	• Declaration of Scott R. Mosko (found at	• The Highlighted And Unredacted Version of Defendants		
Motion to File Under Seal The	the end of the motion for	ConnectU LLC, Pacific Northwest Software,		
Highlighted And Unredacted Version	sealing, Dk # 302)	Inc., Winston Williams, and Wayne Chang's		
of Defendants ConnectU LLC, Pacific Northwest		Opposition to Plaintiffs' Motion for Partial Summary Judgment		
Software, Inc., Winston Williams, and Wayne Chang's		Dkt. #: 290 ● Declaration of		
and Wayne Chang's Opposition to Plaintiffs' Motion		• Declaration of Winston Williams in support thereof		
for Partial Summary Judgment;	<u>Dkt. #: 306</u>	Dkt. #: 297		
Declaration of Winston Williams In Support Thereof;	• Declaration of Yvonne Greer In Support of	• Declaration of G. Hunter Jones, Including Exhibit B in support		
Declaration of G. Hunter Jones, Including Exhibit B;	Sealing Exhibit B to the Declaration of G.	thereof		
And Exhibits A and C to the Declaration	Hunter Jones			
of Scott R. Mosko In Support Thereof"	Dkt. #: 305 • Declaration	Dkt. #s: 298, 299 ● Exhibits A and C to		
	of Theresa A. Sutton In	the Declaration of Scott R. Mosko in support		
	Support of Sealing Exhibit A to the	thereof		
	Declaration of Scott Mosko			
<u>Dkt#: 313</u>	<u>Dkt. #: 315</u>	<u>Dkt. #: 316</u>		Unoppose
Caption: Plaintiffs' Motion To Seal Exhibits A And E-H	• Declaration of Yvonne P. Greer In Support	• Exhibits A, E, F, G, H to the Declaration of Theresa A. Sutton in		
To The Declaration Of Theresa A.	of Sealing Exhibits A, E, F,	Support of its Reply in Support of Motion for		
Sutton In Support Of Its Reply In Support Of Motion For	G, H to the Declaration of Theresa A.	Partial Summary Judgment		

(1) Identity of each sealing motion by docket number and	(2) Declarations in support of the sealing	(3) Documents and exhibits to be sealed	(4) Documents and Exhibits that designating	(5) Whether motion to seal is
caption	requested		party withdraws its designation	opposed
Partial Summary	Sutton in			
Judgment Re Defendants'	Support of its Reply in Support			
Liability Pursuant To California Penal	of Motion for Partial Summary			
Code Section 502(c) And 15 U.S.C. §	Judgment			
7704(a)(1) And 15 U.S.C. § 7704(b)(1)	• No declaration has	<u>Dkt. #: 317</u> • Exhibits 1-3, 5, 7 to		
And Exhibits 1-3, 5 And 7 To The	been filed by defendants in	the Declaration of I. Neel Chatterjee in		
Declaration Of I. Neel Chatterjee In	support of Exhibits 1-3, 5, 7	Support of Reply in Support of Motion to		
Support Of Reply In Support Of Motion	to the Declaration of I.	Compel Compliance		
To Compel	Neel Chatterjee			
Compliance By Pacific Northwest	in Support of Reply in Support			
Software And Winston Williams	of Motion to Compel			
With Order Granting Motion To Compel	Compliance			
Supplemental Interrogatory				
Responses Dkt#: 321		Dkt. #: 322		Unopposed
Caption:	Supporting	• Highlighted And		
"Defendants' Administrative	Declaration of Scott Mosko	Unredacted Version of Defendants' ConnectU		
Motion to File Under Seal The	(found at the end of the motion for	LLC, Pacific Northwest Software, Inc., Winston		
Highlighted And Unredacted Version	sealing, Dk # 321)	Williams and Wayne Chang's (Revised)		
of Defendants' ConnectU LLC,		Opposition to Plaintiffs' Motion for Partial		
Pacific Northwest Software, Inc.,		Summary Judgment;		
Winston Williams and Wayne Chang's		Dkt. #: 323 • Declaration of		
(Revised) Opposition to		Winston Williams in support thereof		
Plaintiffs' Motion for Partial Summary				
Judgment; And Declaration of				
Winston Williams In				

1 2 3 4	(1) Identity of each sealing motion by docket number and caption	(2) Declarations in support of the sealing requested	(3) Documents and exhibits to be sealed	(4) Documents and Exhibits that designating party withdraws its designation	(5) Whether motion to seal is opposed
5	<u>Dkt#: 328</u>		<u>Dkt. #: 327</u>		Unopposed
6	Caption : Plaintiffs' Motion To Seal	No declaration has been filed in	• Exhibits B, C, D to the Declaration of		
7	Exhibits B-D To The Declaration Of	support of Exhibits B, C, D	Yvonne Greer Submitting		
8	Yvonne Greer Submitting	to the Declaration of	Supplemental Evidence		
9	Supplemental Evidence In Support	Yvonne Greer Submitting			
10	Of Plaintiffs' Motion For Partial	Supplemental Evidence			
11	Summary Judgment [Doc. 251] And				
12	Motion To Compel Compliance By				
12	Pacific Northwest Software and				
14	Winston Williams [Doc. 271]				
15	<u>Dkt#: 333</u>	<u>Dkt. 334</u>	<u>Dkt. #: 329.</u>		Unopposed
16	Caption: Plaintiffs'	Declaration of Theresa A.	• Facebook, Inc. and		
17	Motion to Seal (I) Plaintiffs' Confidential Motion;	Sutton Pursuant to Civ.L.R. 7-11	Mark Zuckerberg's Confidential Motion with [Proposed] Order		
18	(II) Declaration of Theresa A. Sutton	and 79-5(b)	Granting Confidential		
19	and Exhibits in				
20	Support Thereof; (III) Declaration of Greg Roussel and		 <u>Dkt. #: 330</u> Declaration of Theresa A. Sutton in 		
20	Exhibits in Support Thereof; and (IV)		Support of Facebook, Inc. and Mark		
22	Declaration of Mark Howitson		Zuckerberg's Confidential Motion		
23	110 witson		Exhibits A and B to		
24			the Declaration of Theresa A. Sutton		
25			Dkt. #: 331		
26			• Declaration of Greg Roussel in Support of		
27			Facebook, Inc. and Mark Zuckerberg's		
28			Confidential Motion		
	OHS		(

(1) Identity of each sealing motion by docket number and caption	(2) Declarations in support of the sealing requested	(3) Documents and exhibits to be sealed	(4) Documents and Exhibits that designating party withdraws its designation	(5) Whether motion to seal is opposed
		• Exhibits A through C to the Declaration of Greg Roussel		
		 <u>Dkt. #: 332</u> Declaration of Mark Howitson in Support of Facebook, Inc. and Mark Zuckerberg's Confidential Motion 		
<u>Dkt #: 355</u>	Dkt. #: 356.	<u>Dkt. #: 357</u>		Unoppose
Caption: Plaintiffs' Administrative Motion to Seal: (1)	Declaration of Theresa A. Sutton Pursuant	• Administrative Request Pursuant to Civil L.R. 7-11		
Administrative Request Pursuant to Civil L.R. 7-11; (2)	to Civ.L.R. 7-11 and 79-5(b)	• Declaration of I. Neel Chatterjee in		
Declaration of I. Neel Chatterjee in Support of Administrative		Support of Administrative Request • <u>Exhibits A and B</u> to the Declaration of I.		
Request, and Exhibits Attached		Neel Chatterjee		
Thereto; (3) Proposed Order		• [Proposed] Order Granting Administrative		
Granting Administrative		Request		
Request Dkt#: 360	<u>Dkt. #: 361</u>	Not e-filed		Unoppose
Caption:	Declaration of	• ConnectU's		
"ConnectU's Administrative Motion to Seal:	Evan A. Parke In Support of ConnectU's	Opposition to Plaintiffs' Administrative Request Pursuant to Civil L.R. 7-		
(1) ConnectU's	Administrative Motion to Seal	11;		
Opposition to Plaintiffs'	(1) ConnectU's	• Declaration of Evan A. Parke and all exhibits		
Administrative Request Pursuant to	Opposition to Plaintiffs'	attached thereto		
Civil L.R. 7-11;	Administrative Request Pursuant	• [Proposed] Order on Administrative Request		
(2) Declaration of Evan A. Parke and	to Ĉivil L.R. 7- 11;	pursuant to Civil L.R. 7- 11.		
exhibits in support thereof; and	(2) Declaration of Evan A. Parke			

(1) Identity of each sealing motion by docket number and caption	(2) Declarations in support of the sealing requested	(3) Documents and exhibits to be sealed	(4) Documents and Exhibits that designating party withdraws its designation	(5) Whether motion to seal is opposed
(3) [Proposed] Order on Administrative Request pursuant to Civil L.R. 7-11."	and exhibits in support thereof; and			
	(3) [Proposed] Order on Administrative			
	Request pursuant to Civil L.R. 7- 11.			
<u>Dkt #: 368</u>	<u>Dkt. #: 369</u>	<u>Dkt #: 366:</u>		Unopposed
Caption: Plaintiffs' Administrative Motion to Seal: (1)	Declaration of Theresa A. Sutton Pursuant	• Administrative request for Leave to File Reply to, and Motion to		
Administrative request for Leave to File Reply to, and	to Civ.L.R. 7-11 and 79-5(b)	Strike Portions of, ConnectU, Inc's Opposition		
Motion to Strike Portions of, ConnectU, Inc's		• [Proposed] Order Granting Administrative		
Opposition; (2) [Proposed] Order Granting Administrative		Request for Leave to File Pursuant to Civil L.R. 7-11		
Request for Leave to File Pursuant to		• Declaration of Yvonne P. Greer in		
Civil L.R. 7-11; (3) Declaration of Yvonne P. Greeer,		Support of Plaintiffs' Administrative Request for Leave to File		
and Exhibits, in Support of Plaintiffs'		Pursuant to Civil L.R. 7- 11		
Administrative Request for Leave to File Pursuant to		• <u>Exhibits A and B to</u> the Declaration of Yvonne P. Greer		
Civil L.R. 7-11. Dkt#: 371	Dkt. #: 372	<u>Dkt. #: 374</u>		Unopposed
Caption:	Declaration of	• Declaration of Evan		
"ConnectU's Administrative Motion to Seal:	Evan A. Parke In Support Of ConnectU's	A. Parke in Support of ConnectU, Inc.'s Motion for Expedited		
(1) ConnectU's Notice and Motion	Administrative Motion to Seal	Discovery and Evidentiary Hearing, and all exhibits attached		
for Expedited Discovry and	(1) ConnectU's Notice and	thereto		

(1) Identity of each sealing motion by docket number and caption	(2) Declarations in support of the sealing requested	(3) Documents and exhibits to be sealed	(4) Documents and Exhibits that designating party withdraws its designation	(5) Whether motion to seal is opposed
Evidentiary Hearing; (2) Declaration of Evan A. Parke, Cameron Winklevoss, Robert T. Clarkson, and Donna M. Hitcherich and exhibits in support thereof, (3) [Proposed] Order on Motion for Expedited Discovery and Evidentiary Hearing, (4) ConnectU's Motion to Shorten Time and Declaration of Evan A. Parke in support, and (5) [Proposed] Order on ConnectU's Motion to Shorten Time." <u>Dkt #: 376</u> Caption: Administrative Motion by Non- Parties R. Gregory Roussel and Fenwick & West LLP to Seal: (1)	Motion for Expedited Discovry and Evidentiary Hearing; (2) Declaration of Evan A. Parke, Cameron Winklevoss, Robert T. Clarkson, and Donna M. Hitcherich and exhibits in support thereof, (3) [Proposed] Order on Motion for Expedited Discovery and Evidentiary Hearing, (4) ConnectU's Motion to Shorten Time and Declaration of Evan A. Parke in support, and (5) [Proposed] Order on ConnectU's Motion to Shorten Time. Dkt. # 377 Declaration of Kalama M. Lui- Kwan in Support of Administrative Motion by Non- Parties R.	 ConnectU's Notice and Motion for Expedited Discovery and Evidentiary Hearing Declaration of Cameron Winklevoss Declaration of Robert T. Clarkson Declaration of Donna M. Hitcherich [Proposed] Order on Motion for Expedited Discovery and Evidentiary Hearing [Proposed] Order on ConnectU's Motion to Shorten Time. Motion to Quash and for Protective Order; [Proposed] Order Motion to Quash and for Protective Order; [Proposed] Order Dkt #: 379 Declaration of Kalama M. Lui-Kwan in 		Unoppose
Notice of Motion and Motion to Quash and for Protective	Gregory Roussel and Fenwick & West LLP to	Support of Motion to Quash and for Protective Order		

sealing motion by docket number and	(2) Declarations in support of the sealing requested	(3) Documents and exhibits to be sealed	(4) Documents and Exhibits that designating party withdraws its designation	(5) Whether motion to seal is opposed
Order;	Seal Documents			
Memorandum of		• Exhibit A to the		
Points and		Declaration of Kalama		
Authorities; (2)		M. Lui-Kwan		
Declaration of				
Kalama M. Lui-		Dkt. #: 380		
Kwan in Support of		Administrative		
Motion to Quash and		Request by R. Gregory		
for Protective Order;		Roussel to Change Time		
(3) [Proposed] Order		of Deposition Pursuant		
Granting Motion to		to Civil Local Rule 7-		
Quash and for		11; [Proposed] Order		
Protective Order (4)				
Miscellaneous		Dkt. #: 381		
Administrative		Declaration of		
Request by R.		Kalama M. Lui-Kwan in		
Gregory Roussel to		Support of		
Change Time of		Miscellaneous		
Deposition Pursuant		Administrative Request		
to Civil Local Rule		by R. Gregory Roussel		
7-11 (5) Declaration		to Change Time of		
of Kalama M. Lui-		Deposition Pursuant to		
Kwan in Support of		Civil Local Rule 7-11		
Request by R.				
Gregory Roussel to		• <u>Exhibit A</u>		
Change Time of		Declaration of Kalama		
Deposition Pursuant		M. Lui-Kwan in Support		
to Civil Local Rule		of Miscellaneous		
7-11 (6) [Proposed]		Administrative Request		
Order Granting		by R. Gregory Roussel		
Miscellaneous Administrative				
Request by R. Gregory Roussel to				
Change Time of				
Deposition				
	Dkt. #: 384	Dkt. #: 386		Unoppose
				PP
Caption:	Declaration of	• ConnectU, Inc.'s		
	Steven C.	Opposition to		
	Holtzman In	Facebook's		
	Support Of	Administrative Request		
	ConnectU's	For Leave To File Reply		
	Administrative	To, And Motion To		
	Motion to Seal	Strike Portions Of,		
1 1 1 1 - 7 -		ConnectU's Opposition		
Facebook's	(1) 0			
Administrative	(1) ConnectU, Inc.'s Opposition	To Plaintiff's Administrative Request		

(1) Identity of each sealing motion by docket number and caption	(2) Declarations in support of the sealing requested	(3) Documents and exhibits to be sealed	(4) Documents and Exhibits that designating party withdraws its designation	(5) Whether motion to seal is opposed
To File Reply To, And Motion To	to Facebook's Administrative	Pursuant To Civil L.R. 7-11		
Strike Portions Of, ConnectU's	Request For Leave To File	• [Proposed] Order		
Opposition To Plaintiff's	Reply To, And Motion To Strike	Denying Plaintiffs' Admin Request For		
Administrative Request Pursuant To	Portions Of, ConnectU's	Leave To File Reply To, And Motion To Strike		
Civil L.R. 7-11; and	Opposition To Plaintiff's	Portions Of, ConnectU's Opposition To		
(2) [Proposed] Order Denying Plaintiffs'	Administrative Request Pursuant	Plaintiffs' Administrative Request		
Admin Request For Leave To File Reply	To Civil L.R. 7- 11; and	Pursuant To Civil L.R. 7-11.		
To, And Motion To Strike Portions Of,	(2) [Proposed]			
ConnectU's Opposition To	Order Denying Plaintiffs'			
Plaintiffs' Administrative	Admin Request For Leave To			
Request Pursuant To Civil L.R. 7-11."	File Reply To, And Motion To Strike Portions			
	Of, ConnectU's Opposition To			
	Plaintiffs' Administrative			
	Request Pursuant To Civil L.R. 7-			
DL+ #• 303	11.	Dkt #: 306		Unoppose
<u>Dkt #: 393</u>	<u>Dkt. #: 394</u>	<u>Dkt. #: 396</u>		Unoppose
Caption: "ConnectU's Administrative Motion to Seal:	Declaration of Steven C. Holtzman In Support Of	• ConnectU, Inc.'s Reply in Support of Motion to Shorten Time for Motion For		
(1) Administrative	ConnectU's Administrative	Expedited Discovery and Evidentiary Hearing		
Request Pursuant to Civil L.R. 7-11 To	Motion to Seal	 Administrative 		
Reschedule Hearing On Facebook And	(1) Administrative	Request Pursuant to Civil L.R. 7-11 To		
Mark Zuckerberg's Motion to Enforce	Request Pursuant to Civil L.R. 7-	Reschedule Hearing On Facebook And Mark		
Alleged Settlement Agreement;	11 To Reschedule	Zuckerberg's Motion to Enforce Alleged		
(2) Declaration of	Hearing On Facebook And	Settlement Agreement		

(1) Identity of each sealing motion by docket number and caption	(2) Declarations in support of the sealing requested	(3) Documents and exhibits to be sealed	(4) Documents and Exhibits that designating party withdraws its designation	(5) Whether motion to seal is opposed
Steven C. Holtzman in support thereof; (3) [Proposed] Order Granting ConnectU's Administrative Request Pursuant To Civil L.R. 7-11 To Reschedule Hearing ON Facebook and Mark Zuckerberg's Motion to Enforce Alleged Settlement Agreement; and (4) ConnectU, Inc.'s Reply in Support of Motion to Shorten Time for Motion For Expedited Discovery and Evidentiary Hearing	Mark Zuckerberg's Motion to Enforce Alleged Settlement Agreement; (2) Declaration of Steven C. Holtzman in support thereof; (3) [Proposed] Order Granting ConnectU's Administrative Request Pursuant To Civil L.R. 7- 11 To Reschedule Hearing ON Facebook and Mark Zuckerberg's Motion to Enforce Alleged Settlement Agreement; and (4) ConnectU, Inc.'s Reply in Support of Motion to Shorten Time for Motion For Expedited	 Declaration of Steven Holtzman in support thereof and attached exhibits [Proposed] Order Granting ConnectU's Administrative Request Pursuant To Civil L.R. 7-11 To Reschedule Hearing ON Facebook and Mark Zuckerberg's Motion to Enforce Alleged Settlement Agreement 		
Dkt #: 401	Discovery and Evidentiary Hearing Dkt. #: 402	Dkt #: 399		Unopposed
Caption: Plaintiffs' Administrative Motion to Seal: (1) Plaintiff's Opposition to ConnectU's [May 23, 2008]	Declaration of Theresa A. Sutton Pursuant to Civil Local Rule 7-11 and 79-5(B)	• Plaintiff's Opposition to ConnectU's [May 23, 2008] Administrative Request Pursuant to Civil L.R. 7-11		Cuobbooo

(1) Identity of each sealing motion by docket number and caption	(2) Declarations in support of the sealing requested	(3) Documents and exhibits to be sealed	(4) Documents and Exhibits that designating party withdraws its designation	(5) Whether motion to seal is opposed
Administrative Request Pursuant to		• [Proposed] Order Denying ConnectU's		
Civil L.R. 7-11; (2) [Proposed] Order		[May 23, 2008] Administrative request		
Denying ConnectU's [May 23, 2008]		Pursuant to Civil L.R. 7- 11		
Administrative request Pursuant to		Declaration of		
Civil L.R. 7-11; (3) Declaration of		Theresa Sutton in Support of Plaintiffs'		
Theresa Sutton in Support of		Opposition to ConnectU's [May 23,		
Plaintiffs' Opposition to		2008] Administrative Request Pursuant to		
ConnectU's [May 23, 2008]		Civil L.R. 7-11.		
Administrative Request Pursuant to				
Civîl L.R. 7-11. Dkt#: 404	Dkt. #: 405	Dkt. #: 407		Unoppose
Caption:	Declaration of	Second Declaration		
"ConnectU's Administrative	Steven C. Holtzman In	of Evan A. Parke and all Exhibits attached thereto		
Motion to Seal:	Support of ConnectU's			
(1) ConnectU, Inc.'s Opposition to	Administrative Motion to Seal	• ConnectU's Notice and Motion for		
Facebook, Inc. and		Expedited Discovery		
Mark Zuckerberg's Confidential Motion	(1) ConnectU, Inc.'s Opposition	and Evidentiary Hearing		
to Enforce Settlement	to Facebook, Inc. and Mark	• Declaration of Cameron Winklevoss		
Agreement;	Zuckerberg's Confidential	• Declaration of Robert		
(2) Second Declaration of Evan	Motion to Enforce	T. Clarkson		
A. Parke in support thereof,	Settlement Agreement;	• Declaration of Donna M. Hitscherich		
(3) Supplemental Declaration of	(2) Second Declaration of	• [Proposed] Order Denying The		
Robert T. Clarkson in support thereof	Evan A. Parke in support thereof,	Confidential motion By The Facebook, Inc. and		
(4) Declaration of	(3) Supplemental	Mark Zuckerberg To Enforce A Purported		
Robert T. Clarkson	Declaration of Robert T.	Settlement Agreement		

	(1) Identity of each sealing motion by docket number and caption	(2) Declarations in support of the sealing requested	(3) Documents and exhibits to be sealed	(4) Documents and Exhibits that designating party withdraws its designation	(5) Whether motion to seal is opposed
-	(5) Declaration of	Clarkson in			
	Cameron Winklevoss in	support thereof			
	support thereof	(4) Declaration			
	(6) Corrected Declaration of	of Robert T. Clarkson in			
	Donna Hitscherich in support thereof;	support thereof (5) Declaration			
	and	of Cameron			
	(7) [Proposed] Order Denying The	Winklevoss in support thereof			
	Confidential motion By The Facebook,	(6) Corrected Declaration of			
	Inc. and Mark	Donna			
	Zuckerberg To Enforce A Purported	Hitscherich in support thereof;			
	Settlement Agreement"	and			
		(7) [Proposed] Order Denying			
		The Confidential			
		motion By The Facebook, Inc.			
		and Mark Zuckerberg To			
		Enforce A			
		Purported Settlement			
-	Dkt #: 409	Agreement Dkt. #: 410	Dkt. #: 412		Unoppose
					Choppose
	Caption: "ConnectU's	Declaration of Steven C.	• Second Declaration of Evan A. Parke and all		
	Administrative Motion to Seal:	Holtzman In Support of	Exhibits attached thereto		
		ConnectU's			
	(1) ConnectU, Inc.'s Opposition to	Administrative Motion to Seal:	• ConnectU, Inc.'s		
	Motion to Quash;	(1) ConnectU,	Opposition to Motion to Quash		
	(2) Second	Inc.'s Opposition			
	Declaration of Evan A. Parke in support	to Motion to Quash;	• Declaration of Cameron Winklevoss		
	thereof;	(2) Second	• Declaration of Robert		
	(3) Supplemental Declaration of	Declaration of Evan A. Parke in	T. Clarkson		
		LHVAN A PARKAIN		1	1

	(1) Identity of each sealing motion by docket number and caption	(2) Declarations in support of the sealing requested	(3) Documents and exhibits to be sealed	(4) Documents and Exhibits that designating party withdraws its designation	(5) Whether motion to seal is opposed
	in support thereof;		M. Hitscherich		
	(4) Declaration of	(3) Supplemental Declaration of	• [Proposed] Order		
	Robert T. Clarkson	Robert T.	Denying The Motion To		
	in support thereof;	Clarkson in support thereof;	Quash And For A Protective Order Filed		
	(5) Declaration of		By Fenwick & West		
	Cameron Winklevoss in	(4) Declaration of Robert T.	LLP And Gregory Roussel		
	support thereof;	Clarkson in	Roussel		
	(6) Corrected	support thereof;			
	Declaration of	(5) Declaration			
	Donna Hitscherich in support thereof;	of Cameron Winkleyoss in			
	and	support thereof;			
	(7) [Proposed] Order	(6) Corrected			
	Denying The Motion	Declaration of			
	To Quash And For A Protective Order	Donna Hitscherich in			
	Filed By Fenwick &	support thereof;			
	West LLP And Gregory Roussel	and			
	Gregory Rousser	(7) [Proposed]			
		Order Denying The Motion To			
		Quash And For			
		A Protective			
		Order Filed By Fenwick & West			
		LLP And Gragory Poussal			
╞	Dkt#: 415 & 425	Gregory Roussel Dkt. # 418	<u>Dkt. #: 415</u>		Unoppose
l	Caption:	Declaration of	• Reply in Support of		
	Administrative	Kalama M. Lui-	Motion to Quash and for		
	Motion by Non- Parties R. Gregory	Kwan in Support of	Protective Order		
l	Roussel and	Administrative	<u>Dkt. #: 416</u>		
	Fenwick & West LLP to Seal: (1)	Motion by Non- Parties R.	• Corrected Declaration of Kalama		
	Reply in Support of	Gregory Roussel	M. Lui-Kwan in Support		
	Motion to Quash and for Protective Order;	and Fenwick & West LLP to	of Motion to Quash and for Protective Order		
	(2) Corrected	Seal Documents			
	Declaration of Kalama M. Lui-				

OHS Wast: 26045

1 2 3 4	(1) Identity of each sealing motion by docket number and caption	(2) Declarations in support of the sealing requested	(3) Documents and exhibits to be sealed	(4) Documents and Exhibits that designating party withdraws its designation	(5) Whether motion to seal is opposed
5	Kwan in Support of Motion to Quash and for Protective Order				
6	<u>Dkt#: 426</u>	<u>Dkt. #: 427</u>	<u>Dkt. #: 420</u>		Unopposed
7	Caption: Plaintiffs' Administrative	Declaration of Theresa A.	• Plaintiffs' Reply in Support of Confidential		
8	Motion to Seal: (1) Plaintiffs' Reply in	Sutton Pursuant to Civil Local	Motion		
9	Support of Confidential Motion;	Rule 7-11 and 79-5(B) in	Dkt. #: 421 • Declaration of I.		
10 11	(2) Declaration of I. Neel Chatterjee and Exhibits in Support	Support of Plaintiffs' Administrative	Neel Chatterjee in Support of Plaintiffs' Reply in Support of		
12	Thereof; (3)	Motion to Seal	Confidential Motion		
12	Declaration of Atulya Sarin, Ph.D. and Exhibits in	[Dkt#: 427]	• <u>Exhibits A through</u> G to the Declaration of		
14	Support Thereof; (4) Declaration of Ted		I. Neel Chatterjee		
15	Wang in Support Thereof; (5)		Dkt. # 422 • Declaration of		
16	Plaintiffs' Objections to and Motion to Strike		Atulya Sarin, Ph.D. in Support of Plaintiffs' Reply in Support of		
17	Evidence Submitted in ConnectU's		Confidential Motion		
18	Opposition to Plantiffs'		• Exhibits 1 and 2 to the Declaration of		
19	Confidential Motion		Atulya Sarin, Ph.D.		
20			 <u>Dkt. # 423</u> Declaration of Ted 		
21 22			Wang in Support Facebook, Inc. and Mark Zuekerberg's		
22			Mark Zuckerberg's Confidential Motion		
24			Dkt. # 424 • Plaintiffs'		
25			Objections to and Motion to Strike		
26			Evidence Submitted in ConnectU's Opposition to Plantiffs'		
27			Confidential Motion		

28

	Case 5:07-cv-01389-JW	Document 452	Filed 06/20/2008	Page 17 of 17			
1							
2							
3							
4							
5							
6							
7							
8							
9							
10							
11							
12	Upon good cause shown, IT IS HEREBY ORDERED						
13	that the motions filed by the parties are GRANTED, and that the above-listed documents shall						
14	be filed under seal in their entiret.	es by the Clerk.					
15							
16							
17							
18							
19							
20	IT IS SO ORDERED.		\mathbf{O}				
21	Dated: June 20, 2008		James	Vare			
22			Honorable Jame United States Dist	es Ware trict Judge			
23		U					
24 25							
25 26							
20 27	¹ Plaintiffs do not agree with this Settlement Agreement confidentia now untimely to the extent more	alternative proposed	l order. The parties ag	reed to keep the terms of the			
27	now untimely to the extent more 11(b).	than three days have	passed since the requ	est was filed. Civil L.R. 7-			
	OHS West 260454320 1	17	7				