

USDC SDNY DOCUMENT ELECTRONICALLY FILED DOC #: DATE FILED: <u>6-7-10</u>	STANTON, J
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**HIGHLY CONFIDENTIAL  
FILED UNDER SEAL**

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

VIACOM INT'L INC., ET AL.,	)	
	)	
Plaintiffs,	)	
v.	)	ECF Case
	)	Civil No. 07-CV-2103 (LLS)
YOUTUBE, INC., ET AL.,	)	
	)	
Defendants.	)	

THE FOOTBALL ASSOCIATION	)	
PREMIER LEAGUE LIMITED, ET AL.,	)	
on behalf of themselves and all others	)	
similarly situated,	)	
	)	ECF Case
Plaintiffs,	)	Civil No. 07-CV-3582 (LLS)
v.	)	
	)	
YOUTUBE, INC., ET AL.,	)	
	)	
Defendants.	)	

[Viacom International, Inc. et al v. Youtube, Inc. et al](#)

Doc. 354

**STIPULATION AND ORDER**

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WHEREAS, on March 5, 2010, this Court issued a Memorandum Endorsement in the action *Viacom International, Inc., et al. v. YouTube, Inc., et al.*, Civil No. 07-CV-2103 (LLS) directing the parties to comply with the protocol set forth therein with respect to the filing of materials relating to the parties' summary judgment motions under seal;

WHEREAS the parties in the related action *The Football Association Premier League Limited, et al. v. YouTube, Inc., et al.*, Civil No. 07-CV-3582 have agreed to proceed in accordance with the Memorandum Endorsement and any related agreements reached by the parties in the *Viacom* action;

WHEREAS, pursuant to the Memorandum Endorsement, the parties and relevant third parties have objected to those portions of the parties' opposition papers, filed under seal on April 30, 2010, they contend should remain under seal;

WHEREAS on May 21, 2010, pursuant to the Memorandum Endorsement, those portions not identified by the parties as those which should remain under seal shall promptly be unsealed;

WHEREAS, experience has shown that with additional time the parties are able to resolve more disagreements regarding what materials should remain under seal and further narrow the materials they seek to maintain under seal;

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned counsel of record, for the parties hereto, that the program set

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forth in the Court's Memorandum Endorsement, as it relates to the parties' opposition papers filed under seal, shall be modified as follows:

1. The parties shall continue to meet and confer regarding the portions of the opposition filings that each party claims should remain under seal until one week after the parties identify to their adversaries the portions of the reply filings that they claim should be kept under seal. This meet and confer will occur concurrently with the meet and confer concerning the unsealing of the parties' reply papers, until June 21, 2010.
2. After those meetings have concluded, the parties shall submit any unresolved matters to the Court by June 28, 2010.
3. With respect to each item that the parties agree should be redacted, they (jointly or singly) shall submit proposed findings of fact, narrowly tailored to the item, to justify its redaction by July 1, 2010.

AGREED and STIPULATED

*Attorney for Viacom International Inc.,  
Comedy Partners, Country Music  
Television, Inc., Paramount Pictures  
Corporation, and Black Entertainment  
Television, LLC*

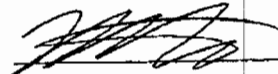
June 1, 2010

By: 

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AGREED and STIPULATED


*Attorneys for Lead Plaintiffs, Named  
Plaintiffs Murbo Music Publishing,  
Inc., Cherry Lane Music Publishing  
Company, Inc., Robert Tur d/b/a Los  
Angeles News Service, X-Ray Dog  
Music, Inc., Fédération Française de  
Tennis, and for the Prospective Class*

By:  \_\_\_\_\_

June 1, 2010

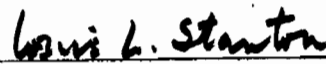
AGREED and STIPULATED

*Attorney for YouTube, Inc., YouTube,  
LLC and Google Inc.*

By:  \_\_\_\_\_

June 1, 2010

SO ORDERED:

  
\_\_\_\_\_  
United States District Judge

6/7/10