

MEMO ENDORSED**PERKINS**coie1900 Sixteenth Street
Suite 1400
Denver, CO 80202-5255T +1.303.291.2300
F +1.303.291.2400
PerkinsCoie.com

May 9, 2024

Defendants' request to file their memorandum of law under seal is granted. Defendants' are directed to file the redacted version for public view. SO ORDERED.



Edgardo Ramos, U.S.D.J.

Dated: 5/10/24

New York, New York

Amanda Tessar
ATessar@perkinscoie.com

D. +1.303.291.2357

F. +1.303.291.2457

VIA ECF FILING

Hon. Edgardo Ramos
U.S. District Court Judge
U.S. District Court for the Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: *Bell Semiconductor, LLC v. Broadcom Corp. et al.*, Case No. 1:24-cv-00156-ER

Dear Judge Ramos:

We represent the defendants in the above-captioned action. In accordance with Section 3 of Your Honor's Individual Practices, and on consent of the plaintiff, we respectfully request permission to file defendant's Memorandum of Law accompanying defendant's Motion to Dismiss under seal. Specifically, we seek to redact those portions of the Memorandum of Law that cite to or reveal information regarding confidential provisions of the parties' underlying agreement.

By way of reminder, this is a breach of contract action stemming from a patent assignment agreement between the parties, executed on November 30, 2017. Section 8.1 of the assignment prohibits the parties from disclosing certain terms, which shall be kept "confidential." This confidentiality provision was intended to keep the negotiated terms of the transactions secret from competitors and potential future transactional counterparties.

To comply with Section 8.1 of the assignment, we propose filing our Memorandum of Law with certain redactions, which are highlighted in the attached documents. The redacted text will be visible to all parties and to the Court but not the general public. A similar application to seal plaintiff's amended complaint was granted by this Court (ECF Dkt. No. 33). The redactions proposed in the current Memorandum of Law largely mirror the same types of redactions made in plaintiff's amended complaint.

Thank you for your consideration.

Hon. Edgardo Ramos
May 9, 2024
Page 2

Sincerely,

/s/ Amanda Tessar

Amanda Tessar

AT:at

cc: All counsel of record (via ECF)