

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION**

UNILOC USA, INC. and
UNILOC SINGAPORE PRIVATE LIMITED,

Plaintiffs,

v.

(1) NATIONAL INSTRUMENTS CORP.;
(2) PERVASIVE SOFTWARE, INC.;
(3) ADOBE SYSTEMS INC.;
(4) FILEMAKER, INC.;
(5) SAFENET, INC.;
(6) CA, INC.;
(7) PINNACLE SYSTEMS, INC.;
(8) SONIC SOLUTIONS;
(9) ONYX GRAPHICS, INC.
(10) SYMANTEC CORP.;
(11) ALADDIN KNOWLEDGE SYSTEMS,
INC. and
(12) ALADDIN KNOWLEDGE SYSTEMS
LTD.

Defendants.

Civ. Action No. 6:10-CV-472

JURY TRIAL DEMANDED

**UNOPPOSED MOTION FOR LEAVE TO FILE UNDER SEAL DEFENDANT CA,
INC.'S MOTION TO STRIKE EXHIBIT B TO PLAINTIFFS' PRELIMINARY PATENT
INFRINGEMENT CONTENTIONS AND SUPPORTING MEMORANDUM OF LAW
AND ACCOMPANYING DECLARATIONS**

COMES NOW, CA, Inc. ("CA"), and files this Motion for Leave to File Under Seal and, in support thereof, would respectfully show the Court as follows:

CA's Motion to Strike Exhibit B to Plaintiffs' Preliminary Patent Infringement Contentions and supporting Memorandum of Law (the "Motion to Strike") and accompanying

declarations of Joshua C. Krumholz, Pricilla Sanginario and Anthony Piergallini contain information that CA considers to be highly confidential. Accordingly, CA requests that it be permitted to file its Motion and accompanying declarations under seal. Plaintiffs are not opposed to the relief requested in this Motion.

For the reasons stated above, CA requests that it be granted leave to file its Motion to Strike and accompanying declarations under seal, and for such other and further relief to which it may be justly entitled. A proposed order is attached hereto as Exhibit A.

DATED: June 28, 2011

Respectfully submitted,

/s/ Joshua C. Krumholz

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Counsel for CA, Inc.

CERTIFICATE OF SERVICE

I hereby certify that the all counsel of record who are deemed to have consented to electronic service are being served this 28th day of June, 2011, with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3). Any other counsel of record will be served by electronic mail, facsimile transmission and/or first class mail on this same date.

/s/ Benjamin M. Stern _____
Benjamin M. Stern