UNITED STATES DISTRICT COURT EASTERN DISTRICT OF TEXAS TYLER DIVISION

UNILOC USA, INC., et al.

Plaintiffs,

Civil Action No. 6:10-cv-00472

v.

NATIONAL INSTRUMENTS CORP., et al.

JURY TRIAL DEMANDED

Defendants.

UNOPPOSED MOTION FOR LEAVE TO FILE UNDER SEAL PLAINTIFFS' OPPOSITION TO DEFENDANT CA, INC.'S MOTION TO STRIKE EXHIBIT B TO PLAINTIFFS' PRELIMINARY PATENT INFRINGEMENT CONTENTIONS AND <u>ACCOMPANYING DECLARATIONS</u>

Plaintiffs Uniloc USA, Inc. and Uniloc (Singapore) Private Limited (collectively, "Uniloc") file this *Motion for Leave to File Under Seal*. Defendant CA, Inc. filed its *Motion to Strike* and accompanying declarations under seal, explaining that the *Motion*, memorandum, and declarations contain information CA considers to be highly confidential. Because Uniloc's *Opposition* and accompanying declarations are directly responsive to the documents CA filed under seal, Uniloc's *Opposition* and accompanying declarations also contain highly confidential information and should also be filed under seal. CA is not opposed to the request.

Therefore, Uniloc requests that it be granted leave to file its *Opposition* and accompanying declarations under seal. A proposed order is attached.

Dated: July 22, 2011. Respectfully Submitted,

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Certificate of Conference

The undersigned confirms that counsel for Plaintiffs has conferred with counsel for CA,

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Inc., Joshua Krumholz, and CA does not oppose Uniloc filing under seal.

/s/ Jaime Olin Jaime Olin

NELSON BUMGARDNER CASTO, P.C.

Certificate of Service

The undersigned certifies that on July 22, 2011, the foregoing document was filed electronically in compliance with Local Rule CV-5(a). As such, this motion was served on all counsel who have consented to electronic service. Local Rule CV-5(a)(3)(A).

/s/ Edward R. Nelson, III Edward R. Nelson, III