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UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

AMIGA, INC., a Delaware corporation,  
  
Plaintiff,  
  
v.  
  
HYPERION VOF, a Belgium corporation,  
  
Defendant.

No. 07-0631-RSM

**MOTION FOR ENTRY OF  
STIPULATED PROTECTIVE ORDER**

**Note on Motion Calendar: 07/25/08**

**I. MOTION**

COME NOW defendant/counterclaimant Hyperion VOF and Amiga, Inc. and move the Court pursuant to FRCP 26(c) to enter the attached Stipulated Protective Order. This Stipulated Protective Order relates not only to the documents that have been or will be produced by the parties hereto, but also to the documents that have been produced and will be produced by third parties such as Cairncross & Hempelman, who is subject to the Court's Order Denying Plaintiff's Motion to Quash (Dkt. #97).

The proposed Stipulated Protective Order is the result of exhaustive efforts by the parties to resolve disputes over the proper handling of documents and information that the producing entity alleges may contain or be trade secrets. The Stipulated Protective Order

1 further contains detailed procedures for resolving disputes over whether documents are  
2 properly designated “Confidential” or “Highly Confidential – Outside Counsel’s Eyes Only.”  
3 The parties and their counsel accordingly certify that they have conferred in good faith with  
4 each other on this matter, and that the entry of the proposed Stipulated Protective Order is  
5 appropriate. FRCP 26(c).

## 6 II. CONCLUSION

7 For all of the foregoing reasons, Hyperion and Amiga, Inc., stipulate to the entry of, and  
8 ask this Court to enter the attached Stipulated Protective Order.

9 DATED this 25th day of July, 2008.

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