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The Honorable Ricardo S. Martinez

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON

MICROSOFT CORPORATION, a Washington corporation,	)	No. CV07 936RSM
	)	
Plaintiff,	)	<b>IMMERSION CORPORATION’S</b>
	)	<b>MOTION TO FILE UNDER SEAL ITS</b>
v.	)	<b>OPPOSITION TO MICROSOFT’S</b>
	)	<b>MOTION FOR PARTIAL SUMMARY</b>
	)	<b>JUDGMENT REGARDING</b>
IMMERSION CORPORATION, a Delaware corporation,	)	<b>IMMERSION’S AFFIRMATIVE</b>
	)	<b>DEFENSES</b>
	)	
Defendant.	)	NOTE ON MOTION CALENDAR
	)	July 25, 2008

Pursuant to Local Rule 5(g) and Rule 26(c)(1) of the Federal Rules of Civil Procedure (“Rule 26(c)”), defendant Immersion Corporation (“Immersion”) respectfully requests that the Court allow it to file under seal its Opposition to Microsoft’s Motion for Partial Summary Judgment Regarding Immersion’s Affirmative Defenses.

The above-referenced Opposition contains a small number of references to deposition testimony and exhibits that Microsoft has designated as confidential. Immersion disagrees with the designations but is submitting the material under seal out of an excess of caution under the Stipulated Protective Order. Immersion intends to confer with Microsoft regarding whether it is maintaining the designation of the limited content that Microsoft arguably has designated confidential. If Microsoft withdraws the designation, Immersion will publicly file the

IMMERSION’S MOTION TO FILE UNDER SEAL ITS OPPOSITION TO MICROSOFT’S MOTION FOR PARTIAL SUMMARY JUDGMENT REGARDING IMMERSION’S AFFIRMATIVE DEFENSES (CV07 936RSM)

**IRELL & MANELLA LLP**  
A Registered Limited Liability  
Law Partnership Including  
Professional Corporations

1 Opposition. At a minimum, Immersion intends to file publicly at least a redacted version. In  
2 view of the foregoing, Immersion respectfully requests that this Court enter an order sealing the  
3 above-described documents unless the confidentiality designations are withdrawn or there is a  
4 further order of the Court. A proposed order is lodged herewith.

5 DATED July 21, 2008.

6 IRELL & MANELLA LLP

7 By /s/ David R. Kaplan

8 David R. Kaplan

(admitted *pro hac vice*)

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16 *Attorneys for Defendant Immersion Corporation*

1 **CERTIFICATE OF SERVICE**

2 The undersigned attorney certifies that on the 21th day of July, 2008, I electronically filed  
3 the foregoing with the Clerk of the Court using the CM/ECF system which will send notification  
4 of such filing to the following:

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