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The Hon. Ricardo S. Martinez

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

MICROSOFT CORPORATION, a
Washington corporation,

Plaintiff,

v.

IMMERSION CORPORATION, a
Delaware corporation,

Defendant.

No. C07-0936RSM

**PLAINTIFF'S MOTION TO FILE
EXHIBITS B, C, D, 4, 13, 14 & 17
UNDER SEAL**

**Noted for Consideration:
March 7, 2008**

Pursuant to Local Rule 5(g), plaintiff respectfully requests that the Court allow plaintiff to file Exhibits C & D to the Declaration of Wendy E. Lyon In Support of Issuance of Letters Rogatory ("Lyon Declaration") under seal; and Exhibits 4, 13, 14 & 17 attached to the Letters Rogatory ("Letters").

Exhibit B is a true and correct copy of the settlement proposals provided to Sony (Mr. Ina) by Immersion.

Exhibit C are true and correct copies of drafts of the Sony/Immersion Agreement which are labeled "Confidential For Settlement Purposes Only," which were produced by Sony in response to a third-party subpoena.

PLAINTIFF'S MOTION TO FILE EXHIBITS B, C, D, 4, 13, 14 AND
17 UNDER SEAL (NO. C07-936RSM)- 1
4834-0581-2226.01
20363.00411

Riddell Williams p.s.
1001 FOURTH AVENUE
SUITE 4500
SEATTLE, WA 98154-1192
206.624.3600

1 Exhibit D is a true and correct copy of portions of the deposition of Jennifer
2 Liu taken on December 20, 2007.

3 Exhibit 4 is the Sony/Immersion Agreement.

4 Exhibit 13 & 14 are Settlement proposals exchanged by Sony and
5 Immersion.

6 Exhibit 17 are drafts of the Sony/Immersion Agreement.

7 Sealing of certain exhibits is authorized under Local Rule 5(g) because the
8 facts warranting sealing overcome the strong presumption in favor of public
9 access to the document. Moreover, the public's interest in accessing the exhibit to
10 the Lyon Declaration and the Letters are minimal. General information related to
11 the parties' claims can be obtained from plaintiff's motion. Nor do the exhibits
12 deal with any matters of public importance.

13 CONCLUSION

14 For the foregoing reasons, plaintiff respectfully request that the Court allow
15 Exhibits B, C and D to the Declaration of Wendy E. Lyon In Support of Issuance of
16 Letters Rogatory ("Lyon Declaration") and Exhibits 4, 13, 14 and 17 attached to
17 the Letters Rogatory to be filed under seal. An order authorizing sealing is
18 submitted herewith.

19 DATED this 19th day of February, 2008.

20 /s/ Wendy E. Lyon
21 Paul J. Kundtz, WSBA #13548
22 Blake Marks-Dias, WSBA #28169
23 Wendy E. Lyon, WSBA #34461
24 Riddell Williams P.S.
25 1001 Fourth Avenue, Suite 4500
26 Seattle, WA 98154
Tel: (206) 624-3600
Fax: (206) 389-1708
wlyon@riddellwilliams.com
Attorneys for Plaintiff
MICROSOFT CORPORATION

1 **CERTIFICATE OF SERVICE**

2 I, Lisa Werner, declare as follows:

3 I am over 18 years of age and a citizen of the United States. I am
4 employed as a legal secretary by the law firm of Riddell Williams P.S.

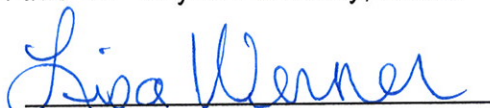
5 On the date noted below I electronically filed the foregoing document titled
6 **PLAINTIFF'S MOTION TO FILE EXHIBITS B, C, D, 4, 13, 14 and 17 UNDER**
7 **SEAL** with the Clerk of the Court using the CM/ECF system which will send
8 notification of such filing to the following counsel for Immersion Corporation:

9 Bradley S. Keller
10 Jofrey M. McWilliam
11 Email: bkeller@byrneskeller.com
jmcwilliam@byrneskeller.com

12 Richard M. Birnholz
13 Morgan Chu
14 Email: rbirnholz@irell.com
mchu@irell.com

15 I declare under penalty of perjury under the laws of the State of
16 Washington that the foregoing is true and correct.

17 Executed at Seattle, Washington this 19th day of February, 2008.

18 

19 Lisa Werner
20 Legal Secretary, Riddell Williams P.S.
21 1001 Fourth Avenue Plaza, Suite 4500
22 Seattle, WA 98154
23 Phone: (206) 624-3600
24 Fax: (206) 389-1708
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