

1 The Hon. Ricardo S. Martinez

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8 UNITED STATES DISTRICT COURT  
9 WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

10 MICROSOFT CORPORATION, a  
Washington corporation,

11 Plaintiff,

12 v.

13 IMMERSION CORPORATION, a  
14 Delaware corporation,

15 Defendant.

No. C07-0936RSM

**PLAINTIFF'S MOTION TO FILE  
MOTION TO COMPEL RESPONSES  
TO ITS SECOND REQUESTS FOR  
PRODUCTION NOS. 2 AND 3 (AND  
SUPPORTING DOCUMENTS)  
UNDER SEAL**

**NOTED ON MOTION CALENDAR:  
MAY 9, 2008**

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17 **I. RELIEF REQUESTED**

18 Pursuant to Local Rule 5(g), plaintiff respectfully requests that the Court  
19 allow plaintiff to file under seal Plaintiff's Motion to Compel Responses to Its  
20 Second Requests for Production Nos. 2 and 3, along with documents supporting  
21 that Motion to Compel.

22 **II. GROUNDS**

23 Although the parties filed a [Proposed] Stipulated Protective Order Regarding  
24 Treatment by the Parties of Confidential Documents with the Court on 2/13/08, Doc. #43,  
25 it was rejected by the Court (Minute Order of 3/20/08). The parties are now working to  
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PLAINTIFF'S MOTION TO FILE MOTION TO COMPEL UNDER  
SEAL (NO. C07-936RSM) - 1  
4845-0768-1538.01  
042308/1700/20363.00411

Riddell Williams P.S.  
1001 FOURTH AVENUE  
SUITE 4500  
SEATTLE, WA 98154-1192  
206.624.3600



1 **CERTIFICATE OF SERVICE**

2 I, Margaret Friedmann, 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 MOTION TO COMPEL RESPONSES TO ITS**  
7 **SECOND REQUESTS FOR PRODUCTION NOS. 2 AND 3 UNDER SEAL** and  
8 **[PROPOSED] ORDER GRANTING PLAINTIFF'S MOTION TO FILE MOTION TO**  
9 **COMPEL RESPONSES TO ITS SECOND REQUESTS FOR PRODUCTION**  
10 **NOS. 2 AND 3 UNDER SEAL** with the Clerk of the Court using the CM/ECF  
11 system which will send notification of such filing to the following counsel for  
12 Immersion Corporation:

13 Bradley S. Keller  
14 Jofrey M. McWilliam  
15 Byrnes & Keller LLP  
16 1000 Second Avenue, 38<sup>th</sup> Floor  
17 Seattle, WA 98104-4082  
18 Phone: (206) 622-2000  
19 Fax: (206) 622-2522  
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19 I declare under penalty of perjury under the laws of the State of  
20 Washington that the foregoing is true and correct.

21 Executed at Seattle, Washington this 23rd day of April, 2008.

22 

23 Margaret Friedmann  
24 Legal Secretary, Riddell Williams P.S.  
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26 Seattle, WA 98154  
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