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THE HONORABLE RICARDO S. MARTINEZ

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

GINA KIM, on behalf of a class consisting
of herself and all other persons similarly
situated,

Plaintiffs, and as to Ms.
Kim, counterclaim
defendant,

v.

COACH, INC., a Maryland corporation,
and COACH SERVICES, INC., a
Maryland corporation,

Defendants, and, as to
Coach, Inc., counterclaim
plaintiff.

NO. 2:11-cv-00214-RSM

**COACH, INC.’S REPLY IN SUPPORT
OF MOTION TO SEAL**

**NOTED FOR CONSIDERATION:
APRIL 8, 2011**

Coach, Inc. (“Coach”) hereby submits its reply in support of motion to seal (Dkt. No. 22). Coach has been working with plaintiff’s counsel on proposed redactions of Coach, Inc’s Opposition to Special Motion to Strike (the “Opposition”) and of the Declaration of John Macaluso in Support of Defendant Coach, Inc’s Opposition to Special Motion to Strike (the “Macaluso Declaration”). On or before April 12, 2011, Coach will file redacted versions of the Opposition and the Macaluso Declaration, which documents will be accessible to the public.

Proposed redactions will be strictly limited to portions of the Opposition and the Macaluso Declaration that contain highly confidential business information concerning how

1 Coach identifies counterfeit products, the public disclosure of which would enable
2 counterfeiters to evade detection and which would harm Coach’s business. *See Omax Corp. v.*
3 *Flow Intern. Corp.*, No. C04-2334RSL, 2007 WL 3232540, *1 (W.D. Wash., Oct. 31, 2007)
4 (sealing certain documents relating to businesses’ “long-term strategic plans, proprietary
5 software, control methodology and cutting models, and/or customer and competitor research,”
6 where “disclosure . . . would put [parties] at a competitive disadvantage”). For these reasons
7 and for reasons set forth in Coach’s opening brief, the Court should grant the motion and
8 permit Coach to file the Opposition and Macaluso Declaration under seal.

9 Dated this 8th day of April, 2011.

10 DLA Piper LLP (US)

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12 By: /s/ Stellman Keehnel
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24 Attorneys for defendant and counterclaim plaintiff
25 Coach, Inc.
26

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on April 8, 2011, I electronically filed the foregoing with the Clerk
3 of the Court using the CM/ECF system which will send notification of such filing to all counsel
4 of record.

5 Dated this 8th day of April, 2011.

6 */s/ Stelman Keehnel*
7 _____
8 Stelman Keehnel, WSBA No. 9309

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