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THE HONORABLE JAMES L. ROBERT

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

SRC LABS, LLC & SAINT REGIS
MOHAWK TRIBE,

Plaintiffs,

v.

MICROSOFT CORPORATION,

Defendant.

CASE NO. 2:18-cv-00321-JLR

STIPULATED MOTION FOR
ADDENDUM TO THE PROTECTIVE
ORDER AND [~~PROPOSED~~] ORDER

JURY TRIAL DEMANDED

NOTE ON MOTION CALENDAR:
SEPTEMBER 14, 2018

1 Plaintiffs have served a subpoena on Intel Corporation (“Intel”) seeking certain
2 discoverable information for this case. Intel has requested certain additional protections for the
3 information that it may produce in response to this subpoena. Plaintiffs, Defendant, and Intel
4 have agreed to the additional language proposed by Intel for an addendum to the Protective
5 Order (Dkt. No. 89) already entered in this case. Intel agrees that all discovery disputes arising
6 from Plaintiffs’ January 23, 2018 subpoena issued as part of this case shall be heard by this
7 Court.

8 13. Disclosure of INTEL-HIGHLY CONFIDENTIAL. For any materials designated
9 “INTEL-HIGHLY CONFIDENTIAL,” the following additional provisions apply:

10 (1) Intel Corporation (“Intel”) will be treated like a producing party
11 for purposes of notice and other requirements set forth in the protective order
12 (Dkt. No. 89), including for example, Section 4.4 (notice regarding experts);

13 (2) Intel will be provided advance written notice by the disclosing
14 party at least five days prior to the filing or disclosure of any INTEL-HIGHLY
15 CONFIDENTIAL material, including in motions or during any hearing or trial;

16 (3) Intel will be provided reasonable advance written notice by the
17 receiving party of any requests to modify or withdraw the confidentiality
18 designation of the document or if any seal is lifted that impacts the confidentiality
19 of any INTEL-HIGHLY CONFIDENTIAL material; and

20 (4) The parties to the underlying action (“the Parties”) will not
21 show any Intel confidential information and/or documents designated INTEL-
22 HIGHLY CONFIDENTIAL to any mock jurors and jury/trial consultants (i)
23 without first providing Intel with notice, and (ii) without first obtaining written
24 consent from Intel. Intel shall not unreasonably withhold consent. If no mutually
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1 acceptable agreement can be reached, the Parties and Intel will submit the issue to
2 the Court for resolution.

3 IT IS SO STIPULATED BY COUNSEL FOR PLAINTIFFS, DEFENDANT MICROSOFT,
4 AND NON-PARTY INTEL

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6 Dated this 14th day of September 2018. Respectfully submitted,

7
8 /s/ Patty A. Eakes

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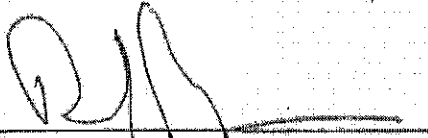
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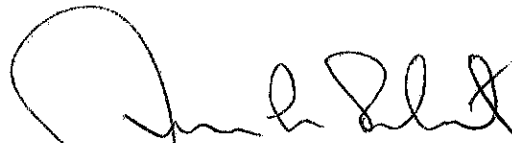
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PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: 16 September 2018



The Honorable JAMES L. ROBART
U.S. DISTRICT JUDGE

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CERTIFICATE OF SERVICE

I hereby certify that on September 14, 2018, I presented this **STIPULATED MOTION FOR ADDENDUM TO THE PROTECTIVE ORDER AND [PROPOSED] ORDER** to the Clerk of the Court for filing and uploading to the CM/ECF system, which will send notification of such filing to all counsel of record.

/s/Erica Knerr
Erica Knerr