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13 UNITED STATES DISTRICT COURT
14 FOR THE NORTHERN DISTRICT OF CALIFORNIA
15 OAKLAND DIVISION

16 WHATSAPP INC., a Delaware corporation,)
17 and FACEBOOK, INC., a Delaware)
corporation,)
18)
Plaintiffs,)
19)
v.)
20)
NSO GROUP TECHNOLOGIES LIMITED)
21 and Q CYBER TECHNOLOGIES LIMITED,)
22 Defendants.)

Case No. 4:19-cv-07123-PJH

**ADMINISTRATIVE MOTION FOR
LEAVE TO FILE PORTIONS OF
MEMORANDUM OF POINTS AND
AUTHORITIES IN SUPPORT OF
PLAINTIFFS' MOTION TO STRIKE
AFFIRMATIVE DEFENSES UNDER
SEAL**

1 TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

2 Pursuant to Civil Local Rules 7-11 and 79-5, plaintiffs, by and through their counsel,
3 respectfully submit this Administrative Motion for an order permitting them to file under seal
4 portions of the Memorandum of Points and Authorities in Support of Plaintiffs' Motion to Strike
5 Affirmative Defenses (the "Memorandum").

6 Plaintiffs request that portions of the Memorandum be filed under seal pursuant to Civil
7 Local Rules 79-5(c) and (d) because they refer to materials that have been designated as "Highly
8 Confidential – Attorney's Eyes Only" by Defendants pursuant to the August 31, 2020 Stipulated
9 Protective Order (ECF No. 132) in the above-captioned action, and Defendants have sought leave
10 to file those materials, and all references to those materials, under seal (ECF No. 133). Plaintiffs
11 take no position as to whether the designated documents satisfy the requirements for sealing, and
12 specifically reserve the right to challenge any confidentiality designations as well as the sealability
13 of the documents at issue.

14 Plaintiffs will lodge with the Court an unredacted copy of the Memorandum in accordance
15 with Civil Local Rule 79-5. Plaintiffs file concurrently herewith the Declaration of Antonio J.
16 Perez-Marques in support of this motion and a proposed sealing order.

1 Dated: September 10, 2020

Respectfully Submitted,

2 DAVIS POLK & WARDWELL LLP

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4 By: /s/ Antonio J. Perez-Marques

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