

Greg D. Andres  
 Antonio J. Perez-Marques  
 Craig T. Cagney  
 (admitted *pro hac vice*)  
 DAVIS POLK & WARDWELL LLP  
 450 Lexington Avenue  
 New York, New York 10017  
 Telephone: (212) 450-4000  
 Facsimile: (212) 701-5800  
 Email: greg.andres@davispolk.com  
 antonio.perez@davispolk.com  
 craig.cagney@davispolk.com

Micah G. Block (SBN 270712)  
 DAVIS POLK & WARDWELL LLP  
 1600 El Camino Real  
 Menlo Park, California 94025  
 Telephone: (650) 752-2000  
 Facsimile: (650) 752-2111  
 Email: micah.block@davispolk.com

*Attorneys for Plaintiffs WhatsApp Inc. and  
 Facebook, Inc.*

UNITED STATES DISTRICT COURT  
 FOR THE NORTHERN DISTRICT OF CALIFORNIA  
 OAKLAND DIVISION

WHATSAPP INC., a Delaware corporation, )  
 and FACEBOOK, INC., a Delaware )  
 corporation, )  
 )  
 Plaintiffs, )  
 )  
 v. )  
 )  
 NSO GROUP TECHNOLOGIES LIMITED )  
 and Q CYBER TECHNOLOGIES LIMITED, )  
 )  
 Defendants. )

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

**ADMINISTRATIVE MOTION FOR  
 LEAVE TO FILE PORTIONS OF  
 REPLY MEMORANDUM OF POINTS  
 AND AUTHORITIES IN FURTHER  
 SUPPORT OF PLAINTIFFS' MOTION  
 TO COMPEL DISCOVERY 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 Reply Memorandum of Points and Authorities in Further Support of Plaintiffs’  
5 Motion to Compel Discovery (the “Reply Brief”).

6 Plaintiffs request that portions of the Reply Brief be filed under seal pursuant to Civil Local  
7 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 to file  
10 those materials, and all references to those materials, under seal (ECF No. 133). Plaintiffs take no  
11 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 Reply Brief 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 11, 2020

Respectfully Submitted,

2 DAVIS POLK & WARDWELL LLP

3  
4 By: /s/ Antonio J. Perez-Marques

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6 Antonio J. Perez-Marques  
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450 Lexington Avenue  
New York, New York 10017  
Telephone: (212) 450-4000  
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Email: greg.andres@davispolk.com  
antonio.perez@davispolk.com  
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