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10 VEOH NETWORKS, INC.

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13 **UNITED STATES DISTRICT COURT**
14 **NORTHERN DISTRICT OF CALIFORNIA**
15 **SAN JOSE DIVISION**

17 IO GROUP, INC., a California Corporation

18 Plaintiff,

19 v.

20 VEOH NETWORKS, Inc., a California
Corporation,

21 Defendant.

Case No.: C06-3926 (HRL)

**STIPULATED ADMINISTRATIVE
MOTION AND [PROPOSED] ORDER
FOR LEAVE TO FILE CERTIFICATION
OF INTERESTED ENTITIES OR
PERSONS UNDER SEAL**

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23 Defendant, Veoh Networks, Inc., hereby requests, pursuant to Civil Local Rule 79-5, an
24 Order granting leave to file Defendant's Certification of Interested Entities or Persons pursuant to
25 Civil Local Rule 3-16 under seal.

26 Defendant will lodge its Certification of Interested Entities or Persons under seal because
27 the Certification identifies various stockholders of Defendant, which information is confidential and
28 not publicly available. Plaintiff has agreed that the Certification may only be viewed by or disclosed

1 to Plaintiff's counsel, including Plaintiff's General Counsel. Plaintiff retains the right to seek any
2 information appearing within the Certification, to the extent such information is otherwise
3 discoverable, subject to further protective orders as appropriate.

4 This request is narrowly tailored to seal only those materials containing confidential
5 information. The only information disclosed in the Certification is the confidential identity of
6 Defendant's stockholders. Consequently Defendant requests that the entire Certification be filed
7 under seal. Such sealed filing will not result in the sealing of any information other than the
8 confidential information Defendant seeks to protect.

9 **SO STIPULATED.**

10 Dated: September 25, 2006

THELEN REID & PRIEST LLP

11
12 /s/ Paul M. Fakler

13 Paul M. Fakler (*pro hac vice*)

14 Michael S. Elkin (*pro hac vice*)

15 Dean A. Morehous

16 Attorneys for Defendant

17 VEOH NETWORKS, INC.

18 Dated: September 25, 2006

THE LAW FIRM OF GILL SPERLEIN

19
20 /s/ Gill Sperlein

GILL SPERLEIN

21 Attorneys for Plaintiff

22 IO GROUP, INC.

23 I, Paul M. Fakler, hereby attest, pursuant to N.D. Cal. General Order No. 45, that the
24 concurrence to the filing of this document has been obtained from each signatory hereto.

25 /s/ Paul M. Fakler

26 Paul M. Fakler (*pro hac vice*)

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[PROPOSED] ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: _____

HONORABLE HOWARD R. LLOYD
UNITED STATES MAGISTRATE JUDGE