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ROBERT JACOBSEN
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11 UNITED STATES DISTRICT COURT
12 FOR THE NORTHERN DISTRICT OF CALIFORNIA
13 SAN FRANCISCO DIVISION

14 ROBERT JACOBSEN,) No. C06-1905-JSW
15)
Plaintiff,)
16)
v.)
17)
MATTHEW KATZER, et al.,) Date: Friday, December 4, 2009
18) Time: 9:00 a.m.
Defendants.) Courtroom: 11, 19th Floor
19) Judge: Hon. Jeffrey S. White
20)
21)
22)
_____)

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1 Pursuant to Northern District Rule 79-5(D), Plaintiff and Counterclaim Defendant Robert
2 Jacobsen submits this motion to seal five documents and certain deposition testimony he submits in
3 support of his Motion for Summary Judgment, and to seal the complete version of that Motion,
4 which references the documents and testimony.

5 The documents are:

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7 1. A document, Bates stamped QSI690, which was produced by QS Industries and
8 designated Highly Confidential—Attorneys’ Eyes Only. The other document, Bates stamped
9 KAM-2003430 to KAM-2003431, was not designated as confidential. Declaration of Victoria K.
10 Hall in Support of Administrative Motion to Seal [hereinafter Hall Sealed Decl.] Ex. A.

11 2. A document, Bates stamped QSI686 by QS Industries and KAM-2003211 to KAM-
12 2003212 by KAMIND Associates, Inc. It is designated as Highly Confidential—Attorneys’ Eyes
13 Only by QSI. It is not designated as confidential by KAMIND Associates. Hall Sealed Decl. Ex.
14 B.

15 3. A document Bates stamped QS688 by QS Industries and KAM-00306814 by
16 KAMIND Associates, Inc. Both QS Industries and KAMIND Associates, Inc. initially designated
17 this document as Highly Confidential—Attorneys’ Eyes Only, but later agreed to re-designate the
18 document as Confidential. Hall Sealed Decl. Ex. C.

19 4. A document, Bates stamped QSI683, which was produced by QS Industries. QS
20 Industries designated this document as Highly Confidential—Attorneys’ Eyes Only. Hall Sealed
21 Decl. Ex. D.

22 5. A document, Bates stamped QSI684-QSI685, which was produced by QS
23 Industries. QS Industries designated this document as Highly Confidential—Attorneys’ Eyes Only.
24 Hall Sealed Decl. Ex. E.

25 6. Excerpts from a Highly Confidential-Attorney Eyes’ Only portion of the Deposition
26 of Matthew Katzer. Defendants agreed to remove this designation but have designated the
27 testimony confidential. Hall Sealed Decl. Ex. F.

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7. The unredacted version of Plaintiff Robert Jacobsen’s Motion for Summary Judgment. Hall Sealed Decl. Ex. G.

Respectfully submitted,

DATED: October 30, 2009

By _____ /s/

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