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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  
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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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