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15 MusicMatch, Inc.

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
(Oakland Division)

GRACENOTE, INC., a Delaware corporation

Plaintiff,

vs.

MUSICMATCH, INC., a Washington
corporation

Defendant.

CASE NO. C 02-3162 CW

**STIPULATED MOTION TO DELETE
FROM PUBLIC DOCKET AND FILE
UNDER SEAL PURSUANT TO CIVIL
LOCAL RULES 7-10 AND 79-5**

Defendant MusicMatch, Inc. (“MusicMatch”) hereby moves pursuant to Civil Local Rules 7-10 and 79-5 for leave to delete from public docket and file under seal Exhibit 2 to the Declaration of Gabriel M. Ramsey in Support of Gracenote, Inc.’s *Ex Parte* Motion for Relief from Stay of Formal Discovery to Permit Gracenote to Commence Discovery Immediately in Aid of Motion for Preliminary Injunction (“Exhibit 2”), filed by Plaintiff Gracenote, Inc. (“Gracenote”) on July 11, 2002.

This motion is made on the grounds that Exhibit 2 contains highly sensitive

1 business information of MusicMatch. Moreover, the parties agree that Exhibit 2 was intended by
2 MusicMatch to remain confidential. Further, it is MusicMatch's position that Exhibit 2 was sent
3 to Gracenote in connection with settlement discussions regarding the parties' outstanding claims.
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5 Dated: August 21, 2002

MANATT, PHELPS & PHILLIPS, LLP
RONALD S. KATZ
EUGENE L. HAHM

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8 By: s/Eugene L. Hahm

Eugene L. Hahm
Attorneys for Defendant
MUSICMATCH, INC.

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11
12 Dated: August 21, 2002

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WILLIAM SLOAN COATS
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GABRIEL M. RAMSEY

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15 By: s/Gabriel M. Ramsey

Gabriel M. Ramsey
Attorneys for Plaintiff
GRACENOTE, INC.

*Filer's Attestation: Pursuant to General Order
No. 45, Section X(B) regarding signatures,
Eugene L. Hahm hereby attests that concurrence
in the filing of the document has been obtained.*

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20 **ORDER**

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22 PURSUANT TO THE STIPULATION, IT IS HEREBY ORDERED that Exhibit 2 to the
23 Declaration of Gabriel M. Ramsey in Support of Gracenote, Inc.'s *Ex Parte* Motion for Relief
24 from Stay of Formal Discovery to Permit Gracenote to Commence Discovery Immediately in Aid
25 of Motion for Preliminary Injunction be deleted from public docket and filed under seal.

26 Dated: August ____, 2002

27 _____
United States District Judge

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