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Attorneys for Defendant
Biosuccess Biotech, Co., Ltd.

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

RICHARD L. CHANG,

Plaintiff,

v.

BIOSUCCESS BIOTECH, CO., LTD., and DOES 1 through 10,

Defendants.

Case No. CV13-01340 JAK (ANx)

DEFENDANT BIOSUCCESS'S APPLICATION TO FILE DOCUMENTS UNDER SEAL PURSUANT TO LOCAL RULE 79.5-1 AND GENERAL ORDER 10-07

BIOSUCCESS BIOTECH, CO., LTD., and DOES 1 through 10,

Counterclaimants,

v.

RICHARD L. CHANG,

Counter-Defendant.

Hon: John A. Kronstadt
Place: Courtroom 750

Defendant Biosuccess Biotech, Co., Ltd. ("Biosuccess") requests the Court's permission to file certain documents under seal, and, as grounds, states as follows:

WHEREAS Third-Party David Chou has designated information contained in Exhibit G to the DECLARATION OF ENOCH H. LIANG IN SUPPORT OF DEFENDANT'S EX PARTE APPLICATION FOR: (1) TEMPORARY RESTRAINING ORDER; (2) OSC RE PRELIMINARY INJUNCTION ("TRO/PI Motion") as "HIGHLY CONFIDENTIAL – ATTORNEYS' EYES ONLY";

WHEREAS portions of the TRO/PI Motion quote from or reference information designated by Third-Party David Chou as "HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY";

WHEREAS Paragraph 12.3 of the parties' Confidentiality Order (Docket No. 46) provides that documents designated as "HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY" are to be filed under seal; and

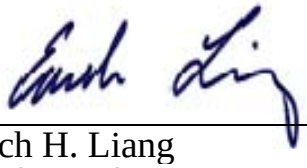
WHEREAS Local Rule 79-5.1 provides that a party wishing to file a document under seal must obtain the Court's permission to do so;

THEREFORE, Defendant respectfully requests the Court's permission to file under seal portions of the TRO/PI Motion and Exhibit G to the Liang Declaration in Support thereof.

Enclosed with this Application are (1) a Proposed Order granting the Application, (2) an unredacted version of the TRO/PI Motion, and (3) Exhibit G to the Liang Declaration.

Dated: December 10, 2013

LEE TRAN LIANG & WANG LLP

By: 

Enoch H. Liang
Attorneys for Defendant
BIOSUCCESS BIOTECH, CO., LTD.