QUINN EMANUEL URQUHART
& SULLIVAN, LLP
James R. Asperger (Bar No. 083188)
jimasperger@quinnemanuel.com
865 S. Figueroa St., 10th Floor
Los Angeles, California 90017
Telephone: (213) 443-3000
Facsimile: (213) 443-3100

Kevin P.B. Johnson (Bar No. 177129)
kevinjohnson@quinnemanuel.com
Todd M. Briggs (Bar No. 209282)
toddbriggs@quinnemanuel.com
555 Twin Dolphin Drive, 5th Floor
Redwood Shores, California 94065
Telephone: (650) 801-5000
Facsimile: (650) 801-5100

Attorneys for Plaintiff the California Institute of Technology

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

The CALIFORNIA INSTITUTE OF TECHNOLOGY,

Plaintiff,

vs.

BROADCOM LIMITED, BROADCOM CORPORATION, AVAGO TECHNOLOGIES LIMITED, APPLE INC., AND CYPRESS SEMICONDUCTOR CORPORATION

Defendants.

CASE NO. 2:16-cv-3714-GW-AGRx

CALTECH'S APPLICATION TO FILE UNDER SEAL

Hearing Date: May 1, 2017
Time: 8:30 A.M.
Judge: Hon. George H. Wu

Fact Discovery Cutoff: Aug. 18, 2017
Pretrial Conference: TBD
Trial Date: TBD

PLEASE TAKE NOTICE THAT pursuant to Civil Local Rules 79-5, Plaintiff California Institute of Technology ("Caltech") submits this application to the Court for an order sealing the materials described below that are filed in connection with Caltech's Response to Defendants' Supplemental Submission Concerning Motion to Disqualify Dr. Matthew Shoemake. This application pertains to the following items:

- Portions of Caltech's Response to Defendants' Supplemental Submission Concerning Motion to Disqualify Dr. Matthew Shoemake, redacted and unredacted versions submitted concurrently herewith;
- Portions of Exhibit 9 to the Shyr Declaration in Support of Caltech's Response to Defendants' Supplemental Submission Concerning Motion to Disqualify Dr. Matthew Shoemake ("Shyr Declaration");
- Exhibit 11 to the Shyr Declaration;
- Exhibit 12 to the Shyr Declaration; and
- Exhibit 13 to the Shyr Declaration.

For the reasons set forth in the Biddinger Declaration submitted herewith, Defendants have represented that Exhibits 9, 11, and 12 contain "CONFIDENTIAL – ATTORNEYS' EYES ONLY" material pursuant to the Protective Order entered in this action on February 2, 2017, Dkt. 101. Further, for the reasons set forth in the Biddinger Declaration, Caltech has reason to believe that Defendants may contend that portions of Caltech's Response and Exhibit 13 constitute confidential information. Out of an abundance of caution, Caltech respectfully submits these materials under seal.

For the foregoing reasons, Caltech respectfully requests that the Court grant Caltech's Application to File under Seal.

DATED: April 27, 2017

Respectfully submitted,

By */s/ Brian P. Biddinger*

Brian P. Biddinger
brianbiddinger@quinnemanuel.com
QUINN EMANUEL URQUHART & SULLIVAN, LLP
51 Madison Avenue, 22nd Floor
New York, New York 10010-1601
Telephone: (212) 849-7000
Facsimile: (212)-849-7100

Attorneys for Plaintiff California Institute of Technology