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19 UNITED STATES DISTRICT COURT

20 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

21 U.S. WECHAT USERS ALLIANCE,
 CHIHUO INC., BRENT COULTER,
 22 FANGYI DUAN, JINNENG BAO, ELAINE
 PENG, and XIAO ZHANG,

23 Plaintiffs,

24 v.

25 DONALD J. TRUMP, in his official capacity
 as President of the United States, and
 26 WILBUR ROSS, in his official capacity as
 Secretary of Commerce,

27 Defendants.

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Case No. 3:20-cv-05910-LB

**STIPULATION AND [PROPOSED]
ORDER RE SEALED MATERIALS**

Judge: Hon. Laurel Beeler

Trial Date: None Set

1 In connection with its October 23, 2020 Order Denying Motion to Stay (“Order”),
2 the Court instructed the parties to file a joint statement regarding the redaction and sealing
3 of information related to Tencent’s mitigation proposal. See ECF 105. Because the sealed
4 material in the Court’s Order reflects information that was designated by Tencent as
5 confidential business information when submitted to the Department of Commerce, the
6 parties would like to give Tencent through its outside counsel an opportunity to provide the
7 parties with its position on the issues raised by the Court and, if necessary, to defend any
8 equities in sealing on its own accord. In furtherance of this goal, the parties stipulate to:
9 (1) sharing with Tencent the Court’s sealed Order Denying Motion to Stay (ECF 104); and
10 (2) extending the time for the parties to file their joint statement responsive to the Court’s
11 request until noon (PST) on Tuesday, November 3, 2020.

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DATED: October 26, 2020

Respectfully submitted,

ROSEN BIEN GALVAN & GRUNFELD LLP

By: */s/ Michael W. Bien*

Michael W. Bien

Attorneys for Plaintiffs

1 DATED: October 26, 2020

UNITED STATES DEPARTMENT OF JUSTICE
CIVIL DIVISION, FEDERAL PROGRAMS
BRANCH

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3 JEFFREY BOSSERT CLARK
4 Acting Assistant Attorney General

5 JOHN V. COGHLAN
6 Deputy Assistant Attorney General

7 ALEXANDER K. HAAS
8 Branch Director

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11 By: */s/ Serena M. Orloff*

SERENA M. ORLOFF
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STUART J. ROBINSON
AMY E. POWELL
Attorneys

14 Attorneys for Defendants

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17 **FILER'S ATTESTATION**

18 As required by Local Rule 5-1(i)(3), I, Michael W. Bien, attest that I obtained
19 concurrence in the filing of this document from Serena M. Orloff, and that I have
20 maintained records to support this concurrence.

21 DATED: October 26, 2020

/s/ Michael W. Bien

Michael W. Bien

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23
24 PURSUANT TO STIPULATION, IT SO ORDERED.

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26 DATED: _____

Hon. Laurel Beeler
United States District/Magistrate Judge