

1 KEESAL, YOUNG & LOGAN  
Peter R. Boutin, SBN 65261  
2 450 Pacific Avenue  
San Francisco, CA 94133  
3 Telephone: (415) 398-6000  
Facsimile: (415) 981-0136  
4 peter.boutin@kyl.com

5 PAUL, WEISS, RIFKIND, WHARTON & GARRISON LLP  
Roberto J. Gonzalez (*pro hac vice forthcoming*)  
6 Jake E. Struebing (*pro hac vice forthcoming*)  
2001 K Street, NW  
7 Washington, DC 20006  
Telephone: (202) 223-7300  
8 Facsimile: (202) 223-7420  
rgonzalez@paulweiss.com  
9 jstruebing@paulweiss.com

10 Anand Sithian (*pro hac vice forthcoming*)  
Julie L. Rooney (*pro hac vice forthcoming*)  
11 1285 Avenue of the Americas  
New York, NY 10019  
12 Telephone: (212) 373-3000  
Facsimile: (212) 757-3990  
13 asithian@paulweiss.com  
jrooney@paulweiss.com

14 *Attorneys for Proposed Intervenor Tencent Holdings Limited*

15  
16 **UNITED STATES DISTRICT COURT**  
17 **NORTHERN DISTRICT OF CALIFORNIA**  
18 **SAN FRANCISCO DIVISION**

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

21 Plaintiffs, )  
22 )

23 v. )

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

26 Defendants. )  
27 )  
28 )

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

**NONPARTY TENCENT HOLDINGS LIMITED'S UNOPPOSED MOTION FOR LEAVE TO FILE COMBINED MOTION AND EXCESS PAGES**

1 Pursuant to Civil Local Rule 7-11, Nonparty Tencent Holdings Limited (“Tencent”)  
2 respectfully moves, on an unopposed basis, for an order permitting it to (i) file a combined  
3 motion to intervene for the limited purpose of protecting its confidential business information  
4 and maintain certain information under seal, and (ii) exceed the default page limit under Civil  
5 Local Rule 7-11(a), and in support thereof states as follows:

6 1. On October 23, 2020, the Court denied Defendants’ motion to stay the  
7 preliminary injunction. *See* ECF Nos. 104 (under seal) and 105 (redacted). The Court instructed  
8 the parties, however, to file a joint statement reconsidering the sealing of information in  
9 Tencent’s Mitigation Proposal and in the Costello Declaration and the Decision Memo by  
10 October 27, 2020. ECF No. 105. To provide Tencent “an opportunity to provide the parties with  
11 its position on the issues raised by the Court and, if necessary, to defend any equities in sealing  
12 on its own accord,” the parties entered into a stipulation extending the time to file their joint  
13 statement to November 3, 2020. ECF No. 107 at 2. The Court so ordered the stipulation on  
14 October 27, 2020. *See* ECF No. 108.

15 2. On October 29, 2020, Counsel for Tencent contacted Plaintiffs’ counsel and  
16 Defendants’ counsel to inform them that, on Monday, November 2, 2020, Tencent would be  
17 filing a combined motion to intervene in the above-captioned litigation for the limited purpose of  
18 protecting its confidential business information, and to maintain certain information under seal.  
19 *See* Gonzalez Decl. ¶ 3.<sup>1</sup>

20 3. In light of the overlapping factual and legal issues, Tencent respectfully submits  
21 that it would be inefficient and a waste of judicial resources to file two separate motions.  
22 Tencent therefore intends to file a single combined motion to intervene for the limited purpose  
23 of protecting its confidential business information, and to maintain certain information under  
24 seal. *See* Gonzalez Decl. ¶ 6. Tencent expects to file this combined motion later today.

25  
26  
27 <sup>1</sup> Citations in the form of “Gonzalez Decl.” refer to the Declaration of Roberto J. Gonzalez in  
28 Support of Nonparty Tencent Holding Limited’s Unopposed Motion for Leave to File Combined  
Motion and Excess Pages, dated November 2, 2020.

1           4.       To the extent that the 5-page default limit in Civil Local Rule 7-11(a) applies to  
2 Tencent’s combined motion, including to maintain certain information under seal, Tencent also  
3 seeks an order permitting it to exceed the default page limit by 10 pages, changing the maximum  
4 length of its motion from 5 pages to 15 pages. Tencent respectfully submits that this request is  
5 reasonable and supported by good cause given the volume and complexity of Tencent’s  
6 confidential business information at issue. *See* Gonzalez Decl. ¶ 7.

7           5.       As set forth in the accompanying Declaration of Roberto Gonzalez, both Plaintiffs  
8 and Defendants consent to Tencent’s motion for leave to file a combined motion and excess  
9 pages. *See* Gonzalez Decl. ¶ 5.

10 Dated: November 2, 2020

Respectfully submitted,

11  
12 KEESAL, YOUNG & LOGAN

13 By: /s/ Peter R. Boutin  
14 Peter R. Boutin

15 PAUL, WEISS, RIFKIND, WHARTON &  
16 GARRISON LLP  
17 Roberto J. Gonzalez (*pro hac vice forthcoming*)  
18 Anand Sithian (*pro hac vice forthcoming*)  
19 Jake E. Struebing (*pro hac vice forthcoming*)  
20 Julie L. Rooney (*pro hac vice forthcoming*)

*Attorneys for Proposed Intervenor Tencent  
Holdings Limited*