

1 UNITED STATES DISTRICT COURT
2 CENTRAL OF CALIFORNIA
3 SANTA ANA DIVISION

4 UNILOC 2017 LLC,
5 Plaintiff,
6 v.
7 INFOR, INC.,
8 Defendant.
9

Case No. 19-cv-01150-DOC-KES
(Lead Case)

**JOINT STIPULATION FOR
ENTRY OF PROTECTIVE ORDER**

[Discovery Document: Referred to
Magistrate Judge Karen E. Scott]

10
11 UNILOC 2017 LLC,
12 Plaintiff,
13 v.
14 NETSUITE INC.,
15 Defendant.

16 UNILOC 2017 LLC,
17 Plaintiff,
18 v.
19 SQUARE ENIX, INC., and
20 SQUARE ENIX LLC,
21 Defendant.
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UNILOC 2017 LLC,
Plaintiff,
v.
UBISOFT, INC.,
Defendant.

UNILOC 2017 LLC,
Plaintiff,
v.
SQUARE ENIX HOLDINGS CO. LTD.,
and
SQUARE ENIX CO., LTD.,
Defendant.

1 WHEREAS, the parties agree that entry of a Protective Order to govern
2 confidentiality of information produced during discovery in the above-captioned case
3 is supported by good cause and in the interests of justice;

4 WHEREAS, the parties have included a good cause statement in the
5 accompanying proposed Stipulated Protective Order setting forth the reasons for entry
6 of the Protective Order;

7 NOW, THEREFORE, the parties stipulate to, and request that the Court enter,
8 the accompanying proposed Stipulated Protective Order.

9
10 Dated: December 14, 2020

Respectfully submitted,

11 PRINCE LOBEL TYE LLP

12 By: /s/ James J. Foster
13 James J. Foster

14 Attorneys for Plaintiff
15 UNILOC 2017 LLC

16 Dated: December 14, 2020

SHEARMAN & STERLING LLP

17 By: /s/ Matthew G. Berkowitz
18 Matthew G. Berkowitz

19 Attorneys for Defendant
20 NETSUITE, INC.

21 Dated: December 14, 2020

ERISE IP PA

22 By: /s/ Michelle L. Marriott
23 Michelle L. Marriott

24 Attorneys for Defendants
25 SQUARE ENIX INC; SQUARE ENIX LLC;
26 SQUARE ENIX HOLDINGS CO. LTD.;
27 SQUARE ENIX CO., LTD.; and UBISOFT
28 INC.

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ATTESTATION OF FILER

I hereby attest that all other signatories listed, and on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing.

/s/ Matthew G. Berkowitz
Matthew G. Berkowitz