

1 THEODORE J. BOUTROUS JR., SBN 132099
2 tboutrous@gibsondunn.com
3 RICHARD J. DOREN, SBN 124666
4 rdoren@gibsondunn.com
5 DANIEL G. SWANSON, SBN 116556
6 dswanson@gibsondunn.com
7 JAY P. SRINIVASAN, SBN 181471
8 jsrinivasan@gibsondunn.com
9 GIBSON, DUNN & CRUTCHER LLP
10 333 South Grand Avenue
11 Los Angeles, CA 90071
12 Telephone: 213.229.7000
13 Facsimile: 213.229.7520

9 VERONICA S. MOYÉ (Texas Bar No.
10 24000092; *pro hac vice*)
11 vmoye@gibsondunn.com
12 GIBSON, DUNN & CRUTCHER LLP
13 2100 McKinney Avenue, Suite 1100
14 Dallas, TX 75201
15 Telephone: 214.698.3100
16 Facsimile: 214.571.2900

MARK A. PERRY, SBN 212532
mperry@gibsondunn.com
CYNTHIA E. RICHMAN (D.C. Bar No.
492089; *pro hac vice*)
crichman@gibsondunn.com
GIBSON, DUNN & CRUTCHER LLP
1050 Connecticut Avenue, N.W.
Washington, DC 20036
Telephone: 202.955.8500
Facsimile: 202.467.0539

ETHAN D. DETTMER, SBN 196046
edettmer@gibsondunn.com
ELI M. LAZARUS, SBN 284082
elazarus@gibsondunn.com
GIBSON, DUNN & CRUTCHER LLP
555 Mission Street
San Francisco, CA 94105
Telephone: 415.393.8200
Facsimile: 415.393.8306

Attorneys for Defendant APPLE INC.

14 **UNITED STATES DISTRICT COURT**
15 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**
16 **OAKLAND DIVISION**

17 IN RE APPLE IPHONE ANTITRUST
18 LITIGATION

Case No. 4:11-cv-06714-YGR

19 _____)
20 DONALD R. CAMERON, et al.,)
21 Plaintiffs,)
22 v.)
23 APPLE INC.)
24 Defendant.)

No. 4:19-cv-03074-YGR

**MOTION TO VACATE AND [PROPOSED]
ORDERS ENTERING SUPPLEMENTAL
PROTECTIVE ORDERS**

24 Defendant.)

The Honorable Yvonne Gonzalez Rogers

25 EPIC GAMES, INC.,)
26 Plaintiff,)
27 v.)
28 APPLE INC.,)
Defendant.)

No. 4:20-cv-05640-YGR-TSH

MOTION TO VACATE AND [PROPOSED] ORDERS ENTERING SUPPLEMENTAL PROTECTIVE

1 On April 30, 2021, Consumer Plaintiffs filed an Administrative Motion for Entry of
2 Supplemental Protective Orders (the “Original Supplemental Protective Orders”) on behalf of four
3 third-party app developers (Zynga, Inc.; Niantic, Inc.; The Walt Disney Company; and Electronic
4 Arts, Inc.). *See* Case No. 4:11-cv-06714-YGR at Dkt. 435; Case No. 4:19-cv-03074-YGR at Dkt.
5 323; and Case No. 4:20-cv-05640-YGR at Dkt. 562. Apple subsequently met and conferred with
6 each of these third-party app developers and was able to reach an agreement with each for entry of
7 Supplemental Protective Orders (the “Revised Supplemental Protective Orders”). Apple
8 submitted filings containing the Revised Supplemental Protective Orders. *See* Case No. 4:11-cv-
9 06714-YGR at Dkts. 437, 438 (Exhibits A and B) and 439 (referencing Dkt. 438 Exhibits D and
10 F); Case No. 4:19-cv-03074-YGR at Dkts. 327, 328 (Exhibits A and B) and 329 (referencing Dkt.
11 328 Exhibits D and F).

12 On June 25, 2021, the following Supplemental Protective Orders were entered by the
13 Court:

- 14 • 4:11-cv-06714-YGR - Dkts. 460, 461, 462, 463
- 15 • 4:19-cv-03074-YGR - Dkts. 354, 355, 356, 357
- 16 • 4:20-cv-05640-YGR - Dkts. 798, 799, 800, 801

17 These Supplemental Protective Orders that were entered appear to be the same as the Original
18 Supplemental Protective Orders, not the Revised Supplemental Protective Orders, which were
19 agreed to by the parties and interested non-parties.

20 Because the parties and interested non-parties have been able to reach an agreement on
21 these proposed supplemental protective orders, Apple respectfully requests that the Court vacate
22 the Supplemental Protective Orders entered at:

- 23 • 4:11-cv-06714-YGR - Dkts. 460, 461, 462, 463
- 24 • 4:19-cv-03074-YGR - Dkts. 354, 355, 356, 357
- 25 • 4:20-cv-05640-YGR - Dkts. 798, 799, 800, 801

26 Apple also respectfully requests that the Court enter the Revised Supplemental Protective
27 Orders which have been reattached here as Exhibit A (Zynga, Inc.), Exhibit B (Niantic, Inc.),
28 Exhibit C (The Walt Disney Company), and Exhibit D (Electronic Arts, Inc.).

MOTION TO VACATE AND [PROPOSED] ORDERS ENTERING SUPPLEMENTAL PROTECTIVE

1 Consumer and Developer Plaintiffs consent to this Motion to Vacate and Proposed Orders
2 Entering Supplemental Protective Orders.

3 Dated: November 18, 2021

GIBSON, DUNN & CRUTCHER LLP

4 By: /s/ Ethan Dettmer

5 Theodore J. Boutrous, Jr.

6 Richard J. Doren

7 Daniel G. Swanson

8 Veronica S. Lewis

9 Cynthia E. Richman

10 Jay P. Srinivasan

Ethan Dettmer

11 Eli M. Lazarus

Attorneys for Defendant Apple Inc.

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MOTION TO VACATE AND [PROPOSED] ORDERS ENTERING SUPPLEMENTAL PROTECTIVE

EXHIBIT A

1 BETSY C. MANIFOLD (182450)
RACHELE R. BYRD (190634)
2 BRITTANY N. DEJONG (258766)
WOLF HALDENSTEIN ADLER
3 **FREEMAN & HERZ LLP**
750 B Street, Suite 1820
4 San Diego, CA 92101
Telephone: 619/239-4599
5 Facsimile: 619/234-4599
manifold@whafh.com
6 byrd@whafh.com
dejong@whafh.com

7
8 *Interim Class Counsel for the
Consumer Plaintiffs*

9 **UNITED STATES DISTRICT COURT**
10 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**
11 **OAKLAND DIVISION**

12 **IN RE APPLE iPHONE ANTITRUST**
LITIGATION

Case No. 4:11-cv-06714-YGR-TSH

**[PROPOSED] SUPPLEMENTAL
PROTECTIVE ORDER GOVERNING
DISCOVERY FROM ZYNGA, INC.**

Hon. Yvonne Gonzalez Rogers

16 DONALD R. CAMERON, et al.,

Case No. 4:19-cv-03074-YGR

17 Plaintiffs,

18 v.

19 APPLE INC.,

20 Defendant.

21 EPIC GAMES, INC., et al.,

Case No. 4:20-cv-05640-YGR

22 Plaintiff, Counter-defendant,

23 v.

24 APPLE INC.,

25 Defendant, Counterclaimant.

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