

FENWICK & WEST LLP
ATTORNEYS AT LAW

1 J. DAVID HADDEN (CSB No. 176148)
dhadden@fenwick.com
2 SAINA S. SHAMILOV (CSB No. 215636)
sshamilov@fenwick.com
3 TODD R. GREGORIAN (CSB No. 236096)
tgregorian@fenwick.com
4 PHILLIP J. HAACK (CSB No. 262060)
phaack@fenwick.com
5 RAVI R. RANGANATH (CSB No. 272981)
rranganath@fenwick.com
6 CHIEH TUNG (CSB No. 318963)
ctung@fenwick.com
7 FENWICK & WEST LLP
Silicon Valley Center
8 801 California Street
Mountain View, CA 94041
9 Telephone: 650.988.8500
Facsimile: 650.938.5200
10

11 Counsel for AMAZON.COM, INC.
and AMAZON WEB SERVICES, INC.

12 UNITED STATES DISTRICT COURT
13 NORTHERN DISTRICT OF CALIFORNIA
14 SAN JOSE DIVISION

15 IN RE: PERSONAL WEB TECHNOLOGIES,
16 LLC ET AL., PATENT LITIGATION

Case No. 5:18-md-02834-BLF

17 AMAZON.COM, INC., and AMAZON WEB
18 SERVICES, INC.,

Case No.: 5:18-cv-00767-BLF

19 Plaintiffs,
20 v.

**DECLARATION OF
RAVI R. RANGANATH IN SUPPORT
OF PERSONALWEB TECHNOLO-
GIES, LLC AND LEVEL 3 COMMUNI-
CATIONS, LLC'S ADMINISTRATIVE
MOTION TO FILE UNDER SEAL**

21 PERSONALWEB TECHNOLOGIES, LLC and
LEVEL 3 COMMUNICATIONS, LLC,

Date: February 7, 2019
Time: 2:00 p.m.
Dept.: Courtroom 3, 5th Floor
Judge: Hon. Beth L. Freeman

22 Defendants.

23 PERSONALWEB TECHNOLOGIES, LLC and
LEVEL 3 COMMUNICATIONS, LLC,

Trial Date: March 16, 2020

24 Counterclaimants,
25 v.

26 AMAZON.COM, INC., and AMAZON WEB
SERVICES, INC.,

27 Counterdefendants.
28

1 I, Ravi R. Ranganath, hereby declare as follows:

2 1. I am an attorney duly licensed to practice law in the state of California and am an
3 associate with the law firm of Fenwick & West LLP, counsel for Amazon.com, Inc., and Amazon
4 Web Services, Inc. (collectively, "Amazon") in the above-captioned action. I have personal
5 knowledge of the facts set forth in this declaration.

6 2. I submit this declaration in support of the Administrative Motion to File Under Seal
7 (5:18-md-02834-BLF, Dkt. 341) ("Administrative Motion") filed by PersonalWeb Technologies,
8 LLC, and Level 3 Communications, LLC (collectively, "PersonalWeb"). The Administrative Mo-
9 tion was filed in support of PersonalWeb's Opposition to Amazon's Motion for Summary Judgment
10 on Declaratory Judgment Claims and Defenses Under the Claim Preclusion and *Kessler* Doctrine
11 (5:18-md-02834-BLF, Dkt. 334) ("Opposition").

12 3. The Administrative Motion seeks an order sealing, in their entirety, Exhibits 4, 12,
13 13A, 13B, 13C, 13D, and 13E to the Declaration of Wesley Monroe in Support of PersonalWeb's
14 Opposition (5:18-md-02834-BLF, Dkt. 340) ("Monroe Declaration") and the corresponding por-
15 tions of the Opposition that quote or summarize these exhibits (collectively, the "Originally Re-
16 quested Sealed Material").

17 4. To provide public access and redact documents only where necessary, I submit this
18 declaration in support of sealing only portions of the Originally Requested Sealed Material (the
19 "Revised Requested Sealed Material"). Specifically, this declaration supports the sealing of:

Document	Document description	Originally Requested Sealed Material	Revised Requested Sealed Material
Exhibit 4 to the Monroe Declaration (Dkt. 340-9).	Pages from the Rule 30(b)(6) deposition of Seth William Markle.	Entire document.	References are to transcript page:line nos.: 51:2-5; 65:1-5; 105:1-6; 164:5-24.

Document	Document description	Originally Requested Sealed Material	Revised Requested Sealed Material
Opposition.	Pages from Personal-Web's opposition brief that quote or summarize excerpts from the Rule 30(b)(6) deposition of Mr. Markle.	References are to page:line nos.: 2:4-6; 2:7-8; 2:10-12; 3:3-4; 3:5-6; 3:26-27; 4:1-2; 4:3-5; 4:6; 5:14-16; 5:16-18; 5:18-19; 5:19-21; 5:23-24; 5:24-26; 5:27-6:1; 6:25; 7:2-5; 7:7; 13:6-7; 14:13-14; 14:18-19; 15:3-5.	References are to page:line nos.: 2:7-8.
Exhibit 12 to the Monroe Declaration (Dkt. 340-18).	Pages from the Rule 30(b)(6) deposition of Jeffrey H. Dean.	Entire document.	References are to transcript page:line nos.: 41:2-25; 76:11-13; 76:24-25; 118:19-21.
Opposition.	Pages from Personal-Web's opposition brief that summarize excerpts from the Rule 30(b)(6) deposition of Mr. Dean.	References are to page:line nos.: 10:7-9; 10:10-11.	References are to page:line nos.: 10:10-11.
Exhibit 13A to the Monroe Declaration (Dkt. 340-19).	Pages from the Supplemental Infringement Contentions from the prior Eastern District of Texas Action, <i>PersonalWeb Techs., LLC v. Amazon.com Inc.</i> , No. 6:11-cv-00658 ("Texas Action"), for U.S. Patent No. 6,415,280.	Entire document.	References are to page nos.: 1-5, 22-24, 27, 30-32, 43-44, 51-55. Although the references are to page numbers, the Revised Requested Sealed Material includes only the redacted portions of these pages in the updated exhibits, not necessarily the pages in their entirety.

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Document	Document description	Originally Requested Sealed Material	Revised Requested Sealed Material
Exhibit 13B to the Monroe Declaration (Dkt. 340-20).	Pages from the Supplemental Infringement Contentions from the Texas Action for U.S. Patent No. 7,802,310.	Entire document.	References are to page nos.: 1-2, 20-29, 31-34, 44-55, 65-69, 75-78, 84-89, 99-102, 109-112. Although the references are to page numbers, the Revised Requested Sealed Material includes only the redacted portions of these pages in the updated exhibits, not necessarily the pages in their entirety.
Exhibit 13C to the Monroe Declaration (Dkt. 340-21).	Pages from the Supplemental Infringement Contentions from the Texas Action for U.S. Patent No. 6,928,442.	Entire document.	References are to page nos.: 1-3, 13-15, 21-23, 29-31, 36-39, 50-52, 58-61. Although the references are to page numbers, the Revised Requested Sealed Material includes only the redacted portions of these pages in the updated exhibits, not necessarily the pages in their entirety.
Exhibit 13D to the Monroe Declaration (Dkt. 340-22).	Pages from the Supplemental Infringement Contentions from the Texas Action for U.S. Patent No. 7,945,544.	Entire document.	References are to page nos.: 11-12, 23-24, 35-38, 48-49, 60-62, 72-74, 85-87, 97-99, 109-112. Although the references are to page numbers, the Revised Requested Sealed Material includes only the redacted portions of these pages in the updated exhibits, not necessarily the pages in their entirety.

Document	Document description	Originally Requested Sealed Material	Revised Requested Sealed Material
Exhibit 13E to the Monroe Declaration (Dkt. 340-23).	Pages from the Supplemental Infringement Contentions from the Texas Action for U.S. Patent No. 5,978,791.	Entire document.	References are to page nos.: 13-15, 22-33, 45-47, 54-59, 70-72, 80-82. Although the references are to page numbers, the Revised Requested Sealed Material includes only the redacted portions of these pages in the updated exhibits, not necessarily the pages in their entirety.
Opposition.	Pages from PersonalWeb's opposition brief that summarize any excerpts from any of Exhibits 13A, 13B, 13C, 13D, and/or 13E to the Monroe Declaration.	References are to page:line nos.: 14:25-26.	None.

5. The Revised Requested Sealed Material contains materials designated by Amazon as “HIGHLY CONFIDENTIAL—SOURCE CODE” or “HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY” pursuant to the Stipulated Protective Order (5:18-md-02834-BLF, Dkt. 290).

6. Excerpts of Exhibits 13A, 13B, 13C, 13D and 13E are designated “HIGHLY CONFIDENTIAL – SOURCE CODE” pursuant to the Stipulated Protective Order. Previously, Amazon designated its source code as “HIGHLY CONFIDENTIAL – SOURCE CODE” under the protective order entered in the prior Texas Action. *PersonalWeb Techs., LLC v. Amazon.com Inc.*, No. 6:11-cv-00658 (E.D. Tex. Filed Dec. 8, 2011), Dkt. 89.

7. Excerpts of Exhibits 13A through 13E reflect sensitive business information, namely infringement contentions reproducing confidential and proprietary source code for Amazon’s Simple Storage Service (“S3”). A party seeking to file documents under seal in connection with a dispositive motion must establish compelling reasons for doing so to rebut the presumption against

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