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10 **Attorneys for PersonalWeb Technologies, LLC**

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

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

CASE NO.: 5:18-md-02834-BLF

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

CASE NO.: 5:18-cv-00767-BLF

CASE NO.: 5:18-cv-05619-BLF

18 Plaintiffs,

19 v.

**[PROPOSED] ORDER GRANTING
 PLAINTIFF PERSONALWEB
 TECHNOLOGIES, LLC'S MOTION FOR
 PROTECTIVE ORDER**

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

22 Defendants.

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

25 Counterclaimants,

26 v.

Date: November 5, 2020
 Time: 9:00 a.m.
 Dept.: Courtroom 3, 5th Floor
 Judge: Hon. Beth Labson Freeman

27 AMAZON.COM, INC. and AMAZON WEB
 28 SERVICES, INC.,

Counterdefendants.

1 PERSONALWEB TECHNOLOGIES, LLC, a
2 Texas limited liability company, and
3 LEVEL 3 COMMUNICATIONS, LLC, a
4 Delaware limited liability company
5 Plaintiffs,
6 v.
7 TWITCH INTERACTIVE, INC. a Delaware
8 corporation,
9 Defendant.
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[PROPOSED] ORDER

Having considered PersonalWeb, LLC’s (“PersonalWeb”) Motion for Protective Order (“Motion”), the documents filed in support of and in opposition to the Motion, the record herein, and such oral argument of counsel at the hearing, PersonalWeb’s Motion for Protective Order is GRANTED and the Court ORDERS as follows:

1. On or before _____, 2020, PersonalWeb shall produce, to the extent it has not already done so the following:
 - a) All communications containing any settlement offers or terms with third parties other than Amazon and Twitch concerning the at-issue technologies in this MDL;
 - b) All written opinions regarding claim preclusion and *Kessler* in any way concerning the cases in this MDL or in connection with the dismissal of the Texas Action; and
 - c) All written opinions regarding infringement of the at-issue technologies in this MDL.
2. No further discovery or production of documents shall be required by PersonalWeb other than as specifically set forth above in this ORDER.

Dated _____

Honorable Beth L. Freeman
United States District Court Judge