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Attorneys for AMAZON.COM, INC.,
AMAZON WEB SERVICES, INC., AND
TWITCH INTERACTIVE, INC.

16 UNITED STATES DISTRICT COURT
17 NORTHERN DISTRICT OF CALIFORNIA
18 SAN JOSE DIVISION

19 IN RE: PERSONAL WEB TECHNOLOGIES,
20 LLC ET AL., PATENT LITIGATION,

21 AMAZON.COM, INC., and AMAZON WEB
22 SERVICES, INC.,

23 Plaintiffs,

24 v.

25 PERSONALWEB TECHNOLOGIES, LLC and
26 LEVEL 3 COMMUNICATIONS, LLC,

27 Defendants.
28

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

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

Case No.: 5:18-cv-05619-BLF

**JOINT STIPULATION RE
EXTENDING PROTECTIONS OF
AMENDED PROTECTIVE ORDER**

1 PERSONALWEB TECHNOLOGIES, LLC, and
2 LEVEL 3 COMMUNICATIONS, LLC,

3 Plaintiffs,

4 v.

5 TWITCH INTERACTIVE, INC.,

6 Defendants.

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1 WHEREAS, on May 7, 2019, the Court granted a Stipulated Amended Protective Order
2 (“Protective Order”) (Dkt. 427) between Plaintiff PersonalWeb Technologies, LLC
3 (“PersonalWeb”) and Defendants Amazon.com, Inc., Amazon Web Services, Inc., and Twitch
4 Interactive, Inc. (collectively, “Amazon”), a copy of which is attached hereto as Exhibit 1.

5 WHEREAS, on August 22, 2022, Amazon and third parties Brilliant Digital
6 Entertainment, Inc. (“BDE”), Claria Innovations, LLC (“Claria”), Europlay Capital Advisors,
7 LLC (“ECA”), and Monto Holdings Pty Ltd’s (“Monto”) (collectively, “Third Parties”) filed a
8 joint statement (Dkt. 773), in which Amazon sought to compel post-judgment document
9 productions of documents that Third Parties withheld based on financial privacy privilege;

10 WHEREAS, on September 12, 2022, the Court issued an order (Dkt. 779) requiring
11 Amazon to serve Third Parties with “a copy of the Protective Order and a proposed stipulation
12 extending the protections thereof to any designated documents no later than September 14, 2022”;

13 WHEREAS, Amazon and Third Parties jointly agree to extend to Third Parties all of the
14 protections under the Protective Order, including, but not limited to, Section 2.10, which allows
15 for information to be designated as “HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES
16 ONLY.”

17 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and between
18 Amazon and Third Parties, through their respective counsel, as follows:

19 The Protective Order shall apply to post-judgment discovery conducted by Amazon from
20 BDE, ECA, Claria and Monto; and

21 BDE, ECA, Claria and Monto may designate the materials that they produce according to
22 the terms of the Protective Order.

23 **IT IS SO AGREED AND STIPULATED.**

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Dated: September 15, 2022

Respectfully submitted,

FENWICK & WEST LLP

By: /s/ Todd R. Gregorian

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Dated: September 15, 2022

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