

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

ROBERT BOSCH LLC, )  
)  
Plaintiff, ) C.A. No. 12-574-LPS  
) (consolidated)  
v. )  
) **JURY TRIAL DEMANDED**  
) **PUBLIC VERSION**  
ALBEREE PRODUCTS, INC., )  
API KOREA CO., LTD., )  
SAVER AUTOMOTIVE PRODUCTS, INC., )  
and COSTCO WHOLESALE CORPORATION, )  
)  
Defendants. )

**ROBERT BOSCH LLC'S UNOPPOSED MOTION FOR REDACTION OF  
TRANSCRIPT OF HEARING HELD ON JUNE 8, 2015**

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*Attorneys for Plaintiff Robert Bosch LLC*

Dated: July 21, 2015  
Public Version Dated: August 13, 2015  
1196008 / 39026

Plaintiff Robert Bosch LLC (“Bosch”) hereby moves for an Order redacting certain portions of the Transcript from the hearing held on June 8, 2015 in the above-captioned action. (D.I. 204.) Bosch’s limited proposed redactions highlighted in yellow are set forth in Exhibit A, and for the Court’s convenience a fully redacted version is attached as Exhibit B.

During the June 8, 2015 hearing, the parties discussed a highly confidential Bosch license, the terms of which are not available to the public. Counsel for Bosch brought this to the Court’s attention at the hearing, and the Court stated, “For today’s proceedings, this document itself isn’t going to be admitted into any kind of evidence and any discussion of it will be kept confidential in the transcript.” (June 8, 2015 Hrg. Tr. at 37:3-6). The Third Circuit has held that courts may exercise its inherent supervisory power to deny access to judicial records, for example, “where they are sources of business information that might harm a litigant’s competitive standing.” *Littlejohn v. BIC Corp.*, 851 F.2d 673, 678 (3d Cir. 1988). Here, Bosch’s proposed redactions are narrowly tailored (limited to only a few lines on pages 14, 18 and 37); and only apply to discussions of the terms of the confidential license and their implications. Thus, Bosch respectfully requests that the Court grant Bosch’s motion to redact limited portions of the June 8th hearing.

Counsel met and conferred regarding this Motion. Defendants agreed not to oppose this Motion, subject to the inclusion of the following statement: Defendants do not consent to the redactions sought because they do not believe they comport with the limited scope of redactions allowed by the Court during the hearing, which pertained to a document and “discussions of it,” and because the presumption of openness discussed in *Joint Stock Soc’y v. UDV N. Am., Inc.*, 104 F. Supp. 2d 390 (D. Del. 2000) and cases cited therein should prevail. However, Defendants do not intend to file an opposition to this motion.

Respectfully submitted,

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**IN THE UNITED STATES DISTRICT COURT  
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**CERTIFICATE OF SERVICE**

I, David E. Moore, hereby certify that on August 13, 2015, the attached document was electronically filed with the Clerk of the Court using CM/ECF which will send notification to the registered attorney(s) of record that the document has been filed and is available for viewing and downloading.

I further certify that on August 13, 2015, the attached document was Electronically Mailed to the following person(s):

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