

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

GENENTECH, INC. and CITY OF HOPE,

Plaintiffs,

v.

AMGEN INC.,

Defendant.

C.A. No. _____

PLAINTIFFS' MOTION TO SEAL COMPLAINT

Plaintiffs Genentech, Inc. and City of Hope (“Plaintiffs”), by and through their undersigned counsel, respectfully move pursuant to Federal Rule of Civil Procedure 5.2 and the Local Rules of Civil Practice and Procedure of the United States District Court for the District of Delaware, for an Order sealing their Complaint against Amgen Inc. (“Defendant”) filed on June 21, 2018 (D.I. 740 in C.A. No. 99-9999). The bases for this Motion are set forth below.

1. The Complaint alleges claims of patent infringement against Defendant.
2. Shortly after Plaintiffs filed the Complaint publicly on June 21, 2018, Defendant expressed concern that the Complaint contains confidential information.
3. As such, Plaintiffs believe that it is necessary and appropriate to seal the Complaint.
4. If the Complaint is sealed, counsel for Plaintiffs will work with counsel for Defendant to prepare and file a redacted, public version of the Complaint within seven days of the Order granting this motion.

WHEREFORE, Plaintiffs respectfully request that their June 21, 2018 Complaint against Defendant be sealed and that the Court enter the proposed order submitted herewith.

DATED: June 22, 2018

Respectfully submitted,

Of Counsel:

William F. Lee
Lisa J. Pirozzolo
Emily R. Whelan
Kevin S. Prussia
Andrew J. Danford
WILMER CUTLER PICKERING
HALE AND DORR LLP
60 State Street
Boston, MA 02109
william.lee@wilmerhale.com
lisa.pirozzolo@wilmerhale.com
emily.whelan@wilmerhale.com
kevin.prussia@wilmerhale.com
andrew.danford@wilmerhale.com

Robert J. Gunther Jr.
WILMER CUTLER PICKERING
HALE AND DORR LLP
7 World Trade Center
250 Greenwich Street
New York, NY 10007
robert.gunther@wilmerhale.com

Daralyn J. Durie
Adam R. Brausa
DURIE TANGRI LLP
217 Leidesdorff St.
San Francisco, CA 94111
ddurie@durietangri.com
abrausa@durietangri.com

/s/ Daniel M. Silver
Michael P. Kelly (#2295)
Daniel M. Silver (#4758)
MCCARTER & ENGLISH, LLP
Renaissance Centre
405 North King Street, 8th Floor
Wilmington, DE 19801
(302) 984-6300
mkelly@mccarter.com
dsilver@mccarter.com

*Counsel for Plaintiffs Genentech, Inc. and
City of Hope*