

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

CARNEGIE MELLON UNIVERSITY,

Plaintiff,

v.

MARVELL TECHNOLOGY GROUP, LTD.
and MARVELL SEMICONDUCTOR, INC.,

Defendants.

Civil Action No. 2:09-cv-00290-NBF

**MARVELL TECHNOLOGY GROUP, LTD. AND MARVELL SEMICONDUCTOR,
INC.'S MOTION FOR LEAVE TO FILE A MOTION FOR
PARTIAL SUMMARY JUDGMENT UNDER SEAL**

Defendants, Marvell Technology Group, Ltd. and Marvell Semiconductor, Inc. (herein after, together "Marvell") by their undersigned counsel, respectfully move this Court for an order permitting Marvell to file a Motion for Partial Summary Judgment under seal. As grounds for this motion, Marvell states as follows:

1. On April 26, 2010, this Court entered the Third Amended Protective Order (the "Protective Order"), which permits the parties to designate documents produced in discovery as "Confidential Information," "Confidential Attorney Eyes Only Information," or "Highly Confidential — Computer Instruction Information."

2. Paragraph 14 of the Protective Order provides that a party wishing to file or submit any documents that have been designated as "Confidential Information," "Confidential Attorney Eyes Only Information," or "Highly Confidential — Computer Instruction Information" must first seek permission to file such documents under seal.

3. On December 20, 2010 Marvell advised Carnegie Mellon University and the Court that it intends to file a Motion for Partial Summary Judgment on December 21, 2010.

4. Marvell's Motion for Partial Summary Judgment and exhibits thereto will contain certain information and documents that have been classified as "Confidential Attorneys Eyes Only Information."

5. Accordingly, Marvell now seeks leave of Court to file this Motion for Partial Summary Judgment and all exhibits attached thereto under seal.

WHEREFORE, Marvell respectfully requests this Court to enter an order granting Marvell leave to file a Motion for Partial Summary Judgment and exhibits attached thereto under seal.

A proposed Order is attached.

Dated: December 21, 2010

Respectfully submitted,

/s/ John E. Hall

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CERTIFICATE OF SERVICE

I hereby certify that on December 21, 2010 the foregoing was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ John E. Hall
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