

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION

TiVo Inc., a Delaware corporation,  
Plaintiff,

v.

1. Dish Network Corporation, a Nevada corporation; 2. EchoStar DBS Corporation, a Colorado corporation; 3. EchoStar Technologies Corporation., a Texas corporation; 4. Echosphere L.L.C., a Colorado limited liability company; 5. EchoStar Satellite L.L.C., a Colorado limited liability company; and 6. EchoStar Corporation, a Nevada corporation.

Defendants.

No. 2-04cv01 DF  
(Judge Folsom)

**DEFENDANTS' UNOPPOSED  
MOTION TO REDACT FEBRUARY  
2009 HEARING TRANSCRIPT**

Pursuant to the Transcript Redaction Procedures for Attorneys for this district, Defendants hereby move for redaction of certain confidential portions of the transcript for the hearing that occurred in Texarkana on February 17, 18, and 19 of 2009. The transcript was filed on March 9, 2009, and appears as entries 910-913 on the Court's docket. Plaintiff does not oppose this motion.

Specifically, Defendants request redaction of the following portions of testimony in which highly confidential proprietary technical information regarding the chip supplied by non-party Broadcom was discussed, related graphics were displayed, and the courtroom was cleared:

February 17, 2009 Hearing Transcript at page 69, line 12 to page 70, line 14; and February 18, 2009 Hearing Transcript at page 211, line 18 to page 213, line 10.

Making the above testimony publicly available risks subjecting Defendants and non-party Broadcom to competitive harm. By entering a Stipulated Protective Order in this case, allowing Defendants to file certain documents under seal, and sealing portions of the 2006 jury trial transcripts, this Court has already recognized the sensitivity of this kind of confidential information and the interest in avoiding its public disclosure. Accordingly, Defendants respectfully request that the Court grant Defendants' narrowly-tailored and unopposed redaction request and order that the above-identified portions of the hearing transcript be sealed.

Dated: March 30, 2009

By: /s/ Rachel Krevans  
Rachel Krevans

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Attorneys for Defendants

CERTIFICATE OF SERVICE

The undersigned hereby certifies that Defendants served the following counsel of record electronically via ECF on March 30, 2009.

/s/Jenny Shay

Jenny Shay