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12 **UNITED STATES DISTRICT COURT**
13 **NORTHERN DISTRICT OF CALIFORNIA**
14 **SAN FRANCISCO**

15
16 OPEN SOURCE SECURITY, INC.,
17 Plaintiff,
18 v.
19 BRUCE PERENS, and Does 1-50,
20 Defendants.

Case No. 3:17-cv-04002-LB

**DECLARATION OF CARA
GAGLIANO IN SUPPORT OF
PLAINTIFFS' ADMINISTRATIVE
MOTION TO SEAL UNDER CIVIL
L.R. 79-5(e)**

Hearing Date: March 29, 2018
Time: 9:30 a.m.
Location: Courtroom C, 15th Floor
Judge: Hon. Laurel Beeler

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DECLARATION OF CARA L. GAGLIANO

I, Cara L. Gagliano, declare as follows:

1. I am an associate of O’Melveny & Myers LLP, the attorneys of record for Defendant Bruce Perens in the above-referenced action, and am admitted to practice before this Court. Pursuant to Civil Local Rule 79-5(e)(1), I submit this Declaration in Support of Plaintiffs’ Administrative Motion to Seal (ECF No. 77). I have personal knowledge and am informed of the facts stated herein and, if called to testify, I could and would testify completely hereto.

2. Plaintiffs filed an administrative motion to seal portions of Plaintiffs’ Opposition to Defendant’s Motion for Attorney’s Fees (ECF No. 78) and Plaintiffs’ Counsel’s Response to Defendant’s Motion for Sanctions (ECF No. 79), and accompanying exhibits for both oppositions.

3. Defendant Bruce Perens agrees that the designated material is sealable for reasons articulated in Defendant Bruce Perens’s Administrative Motion to File Documents Under Seal (ECF No. 63) and the supporting Declaration of Cara Gagliano (ECF No. 63-1). Mr. Perens’s motion to seal was granted by this Court on February 13, 2018. (ECF No. 69.)

4. In conjunction with their motion to seal, Plaintiffs also requested that the Court accept their delayed filings. (ECF No. 77 at 1.) Mr. Perens does not oppose this request.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct, and that this declaration was executed this 12th day of March 2018 in San Francisco, California.

By: /s/ Cara L. Gagliano
Cara L. Gagliano
Of O’Melveny & Myers LLP