IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

REDBOX AUTOMATED RETAIL, LLC,)
Plaintiff,)) Civil Action No. 09-592-RBK
vs.)
TWENTIETH CENTURY FOX HOME ENTERTAINMENT, LLC,))
Defendant.)
•) .

TWENTIETH CENTURY FOX HOME ENTERTAINMENT LLC'S MOTION TO SEAL THE OPENING BRIEF IN SUPPORT OF FOX'S MOTION TO TRANSFER VENUE, THE DECLARATION OF DONALD JEFFRIES AND THE ACCOMPANYING EXHIBITS IN SUPPORT THEREOF

Defendant Twentieth Century Fox Home Entertainment LLC ("Fox") hereby moves, by and through its undersigned counsel, and pending entry of a Court-approved protective order pursuant to Federal Rule of Civil Procedure 26(c), to seal the following: (1) an unredacted version of Fox's Opening Brief in Support of Its Motion to Transfer Venue to the Central District of California; and (2) an unredacted version of the Declaration of Donald Jeffries In Support of Fox's Motion to Transfer Venue to the Central District of California as well as the accompanying exhibits. As stated more fully in Fox's Opening Brief in support of this motion, the Court should grant this motion because: (1) the Opening Brief and Jeffries Venue Transfer Declaration contain sensitive business information, such as negotiation terms and strategy, the disclosure of which could significantly harm Fox; (2) this matter involves private litigants; and (3) the information Fox seeks to protect is not important to public health and safety.

This motion is supported by the Opening Brief, the Declaration of Donald Jeffries, the record in this case, and any oral argument that the Court may hear on this motion.

Dated: October 1, 2009

Respectfully submitted,

/s/ Beth Moskow-Schnoll

Beth Moskow-Schnoll (No. 2900) BALLARD SPAHR LLP

919 North Market Street, 12th Floor

Wilmington, DE 19801 Tel: (302) 252-4447 Fax: (302) 355-0221

Email: moskowb@ballardspahr.com

Neal Walters BALLARD SPAHR LLP Plaza 1000 - Suite 500 Main Street Voorhees, NJ 08043

Tel: (856) 761-3438

Email: waltersn@ballardspahr.com

Attorneys for Twentieth Century Fox Home Entertainment LLC

OF COUNSEL

Yosef Riemer KIRKLAND & ELLIS LLP 601 Lexington Avenue New York City, NY 10022 Tel: (212) 446-4802

Email: yosef.riemer@kirkland.com

Corey C. Watson KIRKLAND & ELLIS LLP 777 South Figueroa Street Los Angeles, CA 90017 Tel: (213) 680-8482

Email: corey.watson@kirkland.com