

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

IN RE
INTEL CORPORATION
MICROPROCESSOR ANTITRUST
LITIGATION,

Plaintiff,

MDL No. 05-1717-JJF

ADVANCED MICRO DEVICES, INC. a
Delaware corporation, and AMD
INTERNATIONAL SALES & SERVICE,
LTD., a Delaware corporation,

Plaintiffs,

v.

C. A. No. 05-441 (JJF)

INTEL CORPORATION, a Delaware
corporation and INTEL KABUSHIKI
KAISHA, a Japanese corporation,

Defendants.

PHIL PAUL, on behalf of himself and all
others similarly situated,

Plaintiffs,

v.

C. A. No. 05-485-JJF

INTEL CORPORATION,

Defendant.

CONSOLIDATED ACTION

**CDW CORPORATION'S JOINDER TO OPPOSITIONS OF DELL INC., MICROSOFT
CORPORATION AND HEWLETT-PACKARD COMPANY
TO AMENDED MOTION TO MODIFY PROTECTIVE ORDER AND
APPROVE PROTOCOL FOR UNSEALING DOCUMENTS**

CDW Corporation ("CDW") hereby joins the legal arguments made by Dell, Inc. (D.I. 1195 in C.A. 05-441), Microsoft Corporation (D.I. 1241) and Hewlett-Packard Company (D.I.

1221) in opposition to the amended motion of the New York Times Company, Situation Publishing, Ltd., Dow Jones & Co., Inc., The Washington Post, the Reporters Committee for Freedom of the Press, and the Computer & Communications Industry Association (collectively, “Movants”) to modify the Confidentiality Agreement and Protective Order and for approval of a protocol for unsealing documents (D.I. 1193).

CDW opposes the Movants’ motion to the extent it seeks access to CDW’s confidential information. Like the other third parties, CDW produced documents in this action in reliance on the protections provided to it under the Confidentiality Agreement and Protective Order. The Protective Order was entered by the Court over two years ago and only after extensive briefing and hearing before the Special Master that culminated in a carefully reasoned 117-page Special Master’s Report and Recommendation. (*See* D.I. 177.) At an absolute minimum, CDW should be consulted and have an opportunity to object before any of CDW’s confidential information is provided to or reviewed by Movants in any form.

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