

# EXHIBIT D

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

ENTROPIC COMMUNICATIONS, LLC	)	
	)	
Plaintiff,	)	
	)	
v.	)	Civil Action No. 2:22-cv-00125-JRG
	)	
CHARTER COMMUNICATIONS, INC.	)	
	)	
Defendant.	)	
	)	
	)	
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**[PROPOSED] ORDER GRANTING MOTION OF THE ELECTRONIC FRONTIER  
FOUNDATION TO INTERVENE AND TO UNSEAL COURT RECORDS**

On this day, the Court considered The Electronic Frontier Foundation’s Motion To Intervene and To Unseal Court Records. Having considered the pleadings and good cause appearing,

IT IS HEREBY ORDERED that the Motion of the Electronic Frontier Foundation is GRANTED.

IT IS FURTHER ORDERED that the Electronic Frontier Foundation is granted leave to intervene for the limited purpose of unsealing documents.

IT IS FURTHER ORDERED that the Protective Order in this case (Dkt. 36) does not absolve proponent(s) of sealing of their duty to overcome the presumption of public access and to file appropriate motions to seal before withholding from the public information filed in dispositive motion papers.

Accordingly,

IT IS FURTHER ORDERED that the Sealed Filings at issue (Dkts. 177, 215, 237, 267, 386, and their attachments) be unsealed unless the parties submit within two weeks accompanying motions to seal, which demonstrate sufficiently compelling reasons for secrecy exist to keep documents or portions thereof under seal. The Court will review those motions and make findings regarding whether the parties have met their burden to override the public's right of access before sealing any of those materials.

DATED:

\_\_\_\_\_  
UNITED STATES DISTRICT JUDGE