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Attorneys for defendants:
PURETHINK LLC, a Delaware limited
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corporation, and JOHN MARK SUHY

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

NEO4J, INC., a Delaware corporation, and
NEO4J SWEDEN AB, a Swedish
corporation,
Plaintiffs,
v.

PURETHINK LLC, a Delaware limited
liability company, IGOV INC., a Virginia
corporation, and JOHN MARK SUHY, an
individual,
Defendants.

AND RELATED COUNTERCLAIMS

NEO4J, INC., a Delaware corporation, and
NEO4J SWEDEN AB, a Swedish
corporation,
Plaintiffs,
v.
GRAPH FOUNDATION, INC., an Ohio
corporation, GRAPHGRID, INC., an Ohio
corporation, and ATOMRAIN INC., a
Nevada corporation,
Defendants.

CASE NO. 5:18-cv-7182 EJD
CASE NO. 5:19-CV-06226-EJD

**DEFENDANTS AND
COUNTERCLAIMANTS'
ADMINISTRATIVE MOTION
TO FILE EXHIBITS
DESIGNATED BY OPPOSING
SIDE AS HIGHLY
CONFIDENTIAL-ATTORNEYS'
EYES ONLY AND
CONFIDENTIAL UNDER
PROTECTIVE ORDER**

[CIVIL L.R. 79-5 (e)]

1. Introduction

Defendants and Counterclaimants PURETHINK LLC, John Mark Suhy and IGOV INC., (“Defendants”) hereby move the Court pursuant to Civil Local Rule 79-5 (e) for an Order to file certain exhibits, supporting Defendants Consolidated Opposition to Motion for Summary Judgment under seal.

2. Law

Local Rule 79-5 (e) provides: Documents Designated as Confidential or Subject to a Protective Order. If the Submitting Party is seeking to file under seal a document designated as confidential by the opposing party or a non-party pursuant to a protective order, or a document containing information so designated by an opposing party or a non-party, the Submitting Party’s declaration in support of the Administrative Motion to File Under Seal must identify the document or portions thereof which contain the designated confidential material and identify the party that has designated the material as confidential (“the Designating Party”). The declaration must be served on the Designating Party on the same day it is filed and a proof of such service must also be filed.

3. Discussion

Defendants seek an order to seal three exhibits because opposing parties Neo4J Sweden AB has designated as “Highly Confidential-Attorneys’ Eyes

Only” (Exhibits 1 and 2 to Beene Dec.) and Neo4J, Inc. has designates as Confidential (Exhibit 7, Beene Dec.) under the Protective Order (Dkt. No. 34) entered in Neo4j, Inc., et al. v. PureThink LLC., et al., Civil Case No. 5:18-cv-07182-EJD.

Neo4J Sweden AB designated Highly Confidential-Attorneys’ Eyes Only Exhibits:

- Exhibit 1 to Beene Dec. is a License Agreement. NSW_000002-16
- Exhibit 2 to Beene Dec. is a Royalty Statement NSW_000001

Neo4J, Inc. designated Confidential Exhibit:

- Exhibit 7 to Beene Dec. is an internal Neo4J, Inc. email thread.

N4J_008109

Dated: January 15, 2021

By: /s/ Adron G. Beene
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