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9 Attorneys for defendants:
10 PURETHINK LLC, a Delaware limited
11 liability company, IGOV INC., a Virginia
12 corporation, and JOHN MARK SUHY

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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)]

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2 **1. Introduction**

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

8 **2. Law**

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

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21 **3. Discussion**

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

1 Only" (Exhibits 1 and 2 to Beene Dec.) and Neo4J, Inc. has designates as
2 Confidential (Exhibit 7, Beene Dec.) under the Protective Order (Dkt. No. 34)
3 entered in Neo4j, Inc., et al. v. PureThink LLC., et al., Civil Case No. 5:18-cv-
4 07182-EJD.

5 Neo4J Sweden AB designated Highly Confidential-Attorneys' Eyes Only
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7 Exhibits:

8

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

11 Neo4J, Inc. designated Confidential Exhibit:

12

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

14 N4J_008109

15 Dated: January 15, 2021

16 By: /s/ Adron G. Beene
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