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PURETHINK LLC, a Delaware limited
liability company, IGOV INC., a Virginia
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 COUNTERCLAIM

CASE NO. 5:18-cv-7182 EJD

**DEFENDANTS
ADMINISTRATIVE MOTION
TO CONSIDER WHETHER
ANOTHER PARTY'S
MATERIAL SHOULD BE
SEALED**

Date: July 27, 2023
Time: 9:00 a.m.
Dept. Courtroom 4, 5th floor
Judge: Hon. Edward J. Davila

Trial Date November 14, 2023

TO ALL PARTIES AND COUNSEL OF RECORD:

Defendants and Counterclaimants PURETHINK LLC, John Mark Suhy and
IGOV INC., ("Defendants") hereby move the Court pursuant to Civil Local

1 Rule 79-5 (f) for an Order to consider filing certain exhibits, supporting
2 Defendants Opposition to Motion for Summary Judgment under seal.

3 Defendants request to provisionally file under seal unredacted version of
4 nine exhibits because opposing parties have designated as “Highly
5 Confidential-Attorneys’ Eyes Only” (Exhibits 28 and 29 to Beene Dec.) and as
6 Confidential (Exhibits 13, 14, 15, 17, 18, 26, 27 to Beene Dec.) under the
7 Protective Order (Dkt. No. 34) entered in Neo4j, Inc., et al. v. PureThink
8 LLC., et al., Civil Case No. 5:18-cv-07182-EJD.

9 THIS IS NOTICE that to Plaintiffs of their obligations under Civil L.R.
10 79-5(f)(3) to file a declaration in support of sealing these documents if they
11 wish to avoid their disclosure to the public by serving this Motion on them as
12 required by Civil L.R. 79-5(f)(2).

13
14 Dated: June 1, 2023

15 By: /s/ Adron G. Beene
16 Adron W. Beene SB# 129040
17 Adron G. Beene SB# 298088
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25 PURETHINK LLC, a Delaware limited
liability company, IGOV INC., a Virginia
corporation, and JOHN MARK SUHY

PROOF OF SERVICE

I am a citizen of the United States. My business address is 7960 Soquel Drive, Ste B #296
Aptos, CA 95003. I am over the age of eighteen years and not a party to the within action.
On the date stated below, I served the attached:

1. **DEFENDANTS ADMINISTRATIVE MOTION TO CONSIDER WHETHER ANOTHER PARTY'S MATERIAL SHOULD BE SEALED**
2. **DECLARATION OF ADRON G. BEENE IN SUPPORT OF DEFENDANTS ADMINISTRATIVE MOTION TO CONSIDER WHETHER ANOTHER PARTY'S MATERIAL SHOULD BE SEALED**
3. **[proposed] ORDER ON DEFENDANTS ADMINISTRATIVE MOTION TO CONSIDER WHETHER ANOTHER PARTY'S MATERIAL SHOULD BE SEALED**
4. **EXHIBITS 13, 14, 15, 17, 18, 26, 27, 28, 29 TO DECLARATION OF ADRON G. BEENE IN SUPPORT OF OPPOSITION TO MSJ**

On the parties listed below at the addresses listed:

to NEO4J, INC., a Delaware corporation, NEO4J SWEDEN AB, attorneys of record:

Jeffrey M. Ratnoff

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John V. Picone III

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___ (By Mailing) I caused a true copy of each document identified above to be placed in a sealed envelope with first class postage affixed. Each such envelope was deposited for collection and mailing that same day in the ordinary course of business in the United States Mail at San Jose, California.

___ (By Personal Service) I caused a true copy of each documents identified above to be delivered by hand to the offices of each addressee above.

___ (By Overnight Delivery) I caused a true copy of each documents identified above to be sealed in an envelope to be delivered to an overnight carrier with delivery fees provided for, addressed of each addressee above.

 X (By Electronic Service) by transmitting via my electronic service address (adronjr@adronlaw.com) the document(s) listed above to the persons at the e-mail addresses set forth above.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Dated: 6-1-23

Adron G. Beene