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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

26 NEO4J, INC., a Delaware corporation,
27 and NEO4J SWEDEN AB, a Swedish
28 corporation,

29 Plaintiffs,
30 v.

31 PURETHINK LLC, a Delaware
32 limited
33 liability company, IGOV INC., a
34 Virginia corporation, and JOHN
35 MARK SUHY, an individual,
36 Defendants.

37 CASE NO. 5:18-cv-7182 EJD

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

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

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Trial Date November 14, 2023

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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
18 Attorney At Law
19 1754 Technology Drive, Suite 228
San Jose, CA 95110
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20 Attorney for Defendants
21 PURETHINK LLC, a Delaware limited
liability company, IGOV INC., a Virginia
corporation, and JOHN MARK SUHY
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1 PROOF OF SERVICE
2

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

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**1. DEFENDANTS ADMINISTRATIVE MOTION TO CONSIDER WHETER
ANOTHER PARTY'S MATERIAL SHOULD BE SEALED**

**2. DECLARATION OF ADRON G. BEENE IN SUPPORT OF
DEFENDANTS ADMINISTRATIVE MOTION TO CONSIDER WHETER
ANOTHER PARTY'S MATERIAL SHOULD BE SEALED**

**3. [proposed] ORDER ON DEFENDANTS ADMINISTRATIVE MOTION TO
CONSIDER WHETER 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. Ratinoff

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John V. Picone III

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Arthur E. Rothrock

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Hopkins & Carley, a Law Corporation

70 South First Street

San Jose, CA 95113

Telephone: (408) 286-9800

Facsimile (408) 998-4790

— (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.

(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