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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

LYFT, INC. Plaintiff, v. AGIS SOFTWARE DEVELOPMENT LLC, Defendant.	Case No. 5:21-cv-04653-BLF **PLAINTIFF LYFT, INC.'S MOTION TO CONSIDER WHETHER ANOTHER PARTY'S MATERIAL SHOULD BE SEALED** Judge: Hon. Beth Labson Freeman Trial Date: October 16, 2023 Courtroom: 3, Fifth Floor

1   Plaintiff Lyft, Inc. ("Lyft") has reviewed and complied with the Court's Standing Order

2   Governing Administrative Motions to File Materials Under Seal.

3   Lyft has reviewed and complied with the Northern District of California's Civil L.R. 79-5

4   and 7-11 (dated November 1, 2021).

5   Lyft respectfully submits this Motion to Consider Whether Another Party's Material Should

6   Be Sealed for the following documents:

ECF or Exh. No.	Document	Portion(s) to Seal	Reason(s) for Sealing
ECF 107	Plaintiff Lyft, Inc.'s Reply in Support of Its Motion for Leave to File First Amended Complaint	Highlighted Portions at: • Page 4: lines 15-21, 22-27; • Page 5: lines 1-2, 24-27; • Page 6: lines 2- 3; • Page 8: lines 1-2, 10-11	The highlighted portions disclose information from Exhibit 13 to Declaration of Bethany R. Salpietra ISO Plaintiff Lyft, Inc.'s Reply ISO Its Motion for Leave to File First Amended Complaint, which AGIS Software Development LLC ("AGIS Software") designated as highly confidential. Lyft takes no position with regard to this designation.
ECF 107-2	Exhibit 13 to Declaration of Bethany R. Salpietra ISO Plaintiff Lyft, Inc.'s Reply ISO Its Motion for Leave to File First Amended Complaint (excerpts from a true and correct copy of the March 22, 2022 Deposition Tr. of Thomas Meriam)	Entire Document	AGIS Software designated the source document from which the information was taken as highly confidential. Lyft takes no position with regard to such designations.

24   This motion is further supported by the Declaration of Bethany R. Salpietra ("Salpietra

25   Declaration") in Support of Plaintiff Lyft, Inc.'s Motion to Consider Whether Another Party's

26   Material Should Be Sealed. Pursuant to Civil L.R., 79-5(e), Lyft identifies AGIS Software as having

27   designated the information above as Highly Confidential.

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1   This motion is narrowly tailored to seal materials necessary and able to overcome the

2   presumption in favor of access to court records. This motion is accompanied by the Salpietra

3   Declaration and a proposed order. Lyft therefore lodges with the Court copies of (1) Plaintiff Lyft,

4   Inc.'s Reply in Support of Its Motion for Leave to File First Amended Complaint, (2) Exhibit 13 to

5   Declaration of Bethany R. Salpietra in Support of Plaintiff Lyft, Inc.'s Reply in Support of Its

6   Motion for Leave to File First Amended Complaint.

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8   Dated: April 19, 2022   Respectfully submitted,

9   By: */s/ Jeremy J. Taylor*
                                                               Jeremy J. Taylor

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