

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**BAKER BOTTS L.L.P.**  
Jeremy J. Taylor (SBN 249075)  
jeremy.taylor@bakerbotts.com  
Arya Moshiri (SBN 324231)  
arya.moshiri@bakerbotts.com  
101 California St., Ste. 3600  
San Francisco, CA 94111  
Telephone: 415.291.6200  
Facsimile: 415.291.6300

Kurt M. Pankratz (*pro hac vice*)  
kurt.pankratz@bakerbotts.com  
Bethany R. Salpietra (*pro hac vice*)  
bethany.salpietra@bakerbotts.com  
2001 Ross Ave., Ste. 900  
Dallas, TX 75201  
Telephone: 214.953.6500  
Facsimile: 214.953.6503

*Attorneys for Plaintiff Lyft, Inc.*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

LYFT, INC.

Plaintiff,

v.

AGIS SOFTWARE DEVELOPMENT LLC,

Defendant.

Case No. 5:21-cv-04653-BLF

**DECLARATION OF BETHANY R.  
SALPIETRA IN SUPPORT OF  
PROPOSED REDACTIONS TO COURT'S  
SEALED ORDER**

Judge: Hon. Beth Labson Freeman  
Trial Date: October 16, 2023  
Courtroom: 3, Fifth Floor

1 I, Bethany R. Salpietra, declare as follows:

2 1. I am over the age of 21 and am fully competent to make this declaration. I have  
3 personal knowledge of all facts recited herein and state that such facts are true and correct to my  
4 knowledge or information and belief, and, if called upon to do so, I would testify competently about  
5 them.

6 2. I am duly admitted to practice law in the State of Texas and before this Court. I am  
7 counsel at the law firm of Baker Botts L.L.P., 2001 Ross Ave., Ste. 900, Dallas, TX 75201, and I  
8 represent Lyft, Inc. (“Lyft”) in the above-captioned action.

9 3. I have reviewed and complied with the Court’s Standing Order Re Civil Cases (dated  
10 February 18, 2021).

11 4. I have reviewed and complied with the Northern District of California’s Civil L.R.  
12 79-5 and 7-11 (dated November 1, 2021).

13 5. I submit this declaration in response to the Court’s Order Requesting Declarations in  
14 Support of Proposed Redactions to Court’s Sealed Order for the following document:

ECF or Exh. No.	Document	Portion(s) to Seal	Reason(s) for Sealing
ECF 136-1	Ex. A to Stipulation With Proposed Redactions	Highlighted Portions at: • Page 2: lines 16-17; • Page 3: lines 12-14, 16-17, 19, 22, 27-28; • Page 4: lines 1-2, 17-18, 28.	AGIS Software designated the source document from which the information was taken as highly confidential. Lyft takes no position with regard to such designations.

20 6. The document that Lyft seeks to file under seal contains confidential information of  
21 AGIS Software. Lyft understands that AGIS Software considers this information confidential. Lyft  
22 takes no position with regard to these designations.

23 7. Lyft therefore lodged with the Court a copy of Ex. A to Stipulation With Proposed  
24 Redactions on May 24, 2022.

25 8. Executed on this 31st day of May, 2022 at Dallas, Texas, County of Dallas. I declare  
26 under penalty of perjury under the laws of the United States of America that the foregoing is true  
27 and correct to the best of my knowledge.  
28

1 Dated: May 31, 2022

Respectfully submitted,

2 By: /s/ Bethany R. Salpietra

3 Bethany R. Salpietra

4 Jeremy J. Taylor (SBN 249075)  
5 Arya Moshiri (SBN 324231)  
6 jeremy.taylor@bakerbotts.com  
7 arya.moshiri@bakerbotts.com  
8 **BAKER BOTTS L.L.P.**  
9 101 California St., Ste. 3600  
10 San Francisco, CA 94111  
11 Telephone: 415.291.6200  
12 Facsimile: 415.291.6300

13 Kurt M. Pankratz (*pro hac vice*)  
14 kurt.pankratz@bakerbotts.com  
15 Bethany R. Salpietra (*pro hac vice*)  
16 bethany.salpietra@bakerbotts.com  
17 **BAKER BOTTS L.L.P.**  
18 2001 Ross Ave., Ste. 900  
19 Dallas, TX 75201  
20 Telephone: 214.953.6500  
21 Facsimile: 214.953.6503

22 *Attorneys for Plaintiff Lyft, Inc.*

23  
24  
25  
26  
27  
28