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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

**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. (dated
4 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 Ex. No.	Document	Description of Portions to be Sealed	Reason for Sealing
ECF 88	Plaintiff Lyft, Inc.’s Motion to Compel Discovery and Compliance with Local Patent Rules	Highlighted Portions at: <ul style="list-style-type: none"> • Page 2: lines 14-15; • Page 3: lines 16-17; 19; 25-28; • Page 4: lines 1-2; 26-27; • Page 5: lines 2-7. 	The highlighted portions disclose information from: <ul style="list-style-type: none"> • Exhibit 10 to Plaintiff Lyft, Inc.’s Motion to Compel Discovery and Compliance with Local Patent Rules, and • Ex. 18 to Plaintiff Lyft, Inc.’s Motion to Compel Discovery and Compliance with Local Patent Rules, which AGIS designated as highly confidential and confidential, respectively. <i>See</i> Moshiri Decl. ¶ 5. Lyft takes no position with regard to these designations. <i>Id.</i>
ECF 88-10, Ex. 10	Exhibit 10 to Plaintiff Lyft, Inc.’s Motion to Compel Discovery and Compliance with Local Patent Rules	Entire Document	AGIS designated this document as highly confidential. <i>See</i> Moshiri Decl. ¶ 5. Lyft takes no position with regard to this designation. <i>Id.</i>
ECF 88-18, Ex. 18	Ex. 18 to Plaintiff Lyft, Inc.’s Motion to Compel Discovery and Compliance with Local Patent Rules	Entire Document	AGIS designated this document as confidential. <i>See</i> Moshiri Decl. ¶ 5. Lyft takes no position with regard to this designation. <i>Id.</i>

24 This motion is further supported by the Declaration of Arya Moshiri (“Moshiri Declaration”)
25 in Support of Plaintiff Lyft, Inc.’s Motion to Consider Whether Another Party’s Material Should Be
26 Sealed. Pursuant to Civil L.R., 79-5(e), Lyft identifies AGIS Software Development LLC as having
27 designated the information above as Highly Confidential or 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 Moshiri
3 Declaration and a proposed order. Lyft therefore lodges with the Court copies of (1) Plaintiff Lyft,
4 Inc.'s Motion to Compel Discovery and Compliance with Local Patent Rules, (2) Exhibit 10 to
5 Plaintiff Lyft, Inc.'s Motion to Compel Discovery and Compliance with Local Patent Rules, and (3)
6 Ex. 18 to Plaintiff Lyft, Inc.'s Motion to Compel Discovery and Compliance with Local Patent
7 Rules.

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Dated: April 6, 2022

Respectfully submitted,

By: /s/ Arya Moshiri

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CERTIFICATE OF SERVICE

I hereby certify that all counsel of record who have consented to electronic service are being served with a copy of this document via electronic mail on April 6, 2022.

/s/ Arya Moshiri

Arya Moshiri