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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

**DECLARATION OF ARYA MOSHIRI IN
SUPPORT OF 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 I, Arya Moshiri, 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 California and before this Court. I
7 am counsel at the law firm of Baker Botts L.L.P., 101 California Street, San Francisco, California
8 94111, and I represent Lyft, Inc. in the above-captioned action.

9 3. I have reviewed and complied with the Northern District of California's Civil L.R.
10 (dated November 1, 2021).

11 4. I submit this declaration in support of Defendant Lyft, Inc.'s Motion to Consider
12 Whether Another Party's Material Should Be Sealed, which asks the Court for an order to file under
13 seal 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>
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5. The documents that Lyft seeks to file under seal contain confidential information of AGIS Software Development LLC (“AGIS”). Lyft understand that AGIS considers this information highly confidential or confidential. Lyft takes no position with regard to these designations.

6. Lyft therefore lodges with the Court copies of (1) Plaintiff Lyft, Inc.’s Motion to Compel Discovery and Compliance with Local Patent Rules, (2) Exhibit 10 to Plaintiff Lyft, Inc.’s Motion to Compel Discovery and Compliance with Local Patent Rules, and (3) Ex. 18 to Plaintiff Lyft, Inc.’s Motion to Compel Discovery and Compliance with Local Patent Rules.

7. Executed on this 6th day of April, 2022 at San Francisco, California, County of San Francisco. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

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1 Dated: April 6, 2022

Respectfully submitted,

2 By: /s/ Arya Moshiri

3 Arya Moshiri

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20 *Attorneys for Plaintiff Lyft, Inc.*

21 **CERTIFICATE OF SERVICE**

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

24 /s/ Arya Moshiri

25 Arya Moshiri

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