



September 23, 2022

12424

Wilshire Boulevard

12th Floor

Los Angeles

California

90025

Tel 310.826.7474

Fax 310.826.6991

www.raklaw.com

**Filed Via ECF**

Hon. Paul G. Gardephe  
United States District Court  
Southern District of New York  
40 Foley Square, Room 2204  
New York, New York 10007

**Re: *Network-1 Technologies, Inc. v. Google LLC, et al.*,  
Case Nos. 1:14-cv-2396-PGG & 1:14-cv-9558-PGG**

Dear Judge Gardephe:

I write on behalf of Plaintiff Network-1 Technologies, Inc. (“Network-1”) to request leave to file under seal several documents that will be submitted in connection with Network-1’s Supplemental Brief in Opposition to Google’s Motion for Summary Judgment. Specifically, Network-1 requests leave to file undredacted copies of Network-1’s Brief, and accompanying Exhibits 86, 87, and 88 under seal. Each of these documents contains material and information designated by Google under the Protective Order in these matters. Because the relevant information is Google’s information, Network-1 requests that the Court permit filing of these documents under seal. Google has indicated that, pursuant to the Court’s Individual Practices, Google will submit a letter explaining its position on sealing by September 26, and provide Network-1 with redactions for any portions of these materials Google requests to remain sealed by that time as well. Network-1 will then file a public, redacted version of its submission.



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Dated: September 23, 2022

Respectfully submitted,

RUSS, AUGUST & KABAT

BY: s/ Brian D. Ledahl

Marc A. Fenster (*pro hac vice*)  
Brian D. Ledahl (*pro hac vice*)  
Adam S. Hoffman (*pro hac vice*)  
Paul A. Kroeger (*pro hac vice*)  
Jacob R. Buczko (*pro hac vice*)  
Amy E. Hayden (*pro hac vice*)  
12424 Wilshire Blvd. 12<sup>th</sup> Floor  
Los Angeles, CA 90025  
Phone: (310) 826-7474  
Fax: (310) 826-6991  
mfenster@raklaw.com  
bledahl@raklaw.com  
ahoffman@raklaw.com  
pkroeger@raklaw.com  
jbuczko@raklaw.com  
ahayden@raklaw.com

Charles R. Macedo  
AMSTER, ROTHSTEIN &  
EBENSTEIN LLP  
90 Park Avenue  
New York, NY 10016  
Phone: (212) 336-8074  
Fax: (212) 336-8001  
cmacedo@arelaw.com

*Attorneys for Network-1  
Technologies, Inc.*