



November 1, 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-SN & 1:14-cv-9558-PGG-SN**

Dear Judge Gardephe:

I write in regard to Plaintiff Network-1 Technologies, Inc.'s October 28, 2022 under seal filing (Dkt. No. 285 in Case No. 1:14-cv-2396-PGG-SN; Dkt. No. 221 in Case No. 1:14-cv-9558-PGG-SN). In Network-1's letter motion to seal preceding that filing (Dkt. No. 284 in Case No. 1:14-cv-2396-PGG-SN; Dkt. No. 220 in Case No. 1:14-cv-9558-PGG-SN), I indicated that Network-1 believed that its filing contained material and information designated by Defendants Google LLC and YouTube LLC (collectively, "Google") under the Protective Order. In that letter, I also noted that Google had indicated to Network-1 that it would submit a letter explaining its position on sealing by October 31, and provide Network-1 with redactions for any portions of these materials Google requests to remain sealed by that time as well. However, Google informed Network-1 that it does not wish for any portion of the October 28 filing to be redacted. Therefore, immediately following this letter, Network-1 will file a public version of the October 28 filing with only the confidentiality label redacted.

Respectfully submitted,

*s/ Amy E. Hayden*

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*)  
RUSS, AUGUST & KABAT  
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



Hon. Paul G. Gardephe  
November 1, 2022  
Page 2

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.*