

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

AGIS SOFTWARE DEVELOPMENT LLC	§	
	§	CASE NO. 2:21-cv-00072-JRG
v.	§	(Lead Case)
	§	
T-MOBILE USA, INC., and T-MOBILE US, INC.	§	<u>JURY TRIAL DEMANDED</u>
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AGIS SOFTWARE DEVELOPMENT LLC	§	
	§	CASE NO. 2:21-cv-00024-JRG
v.	§	(Member Case)
	§	
LYFT, INC.	§	<u>JURY TRIAL DEMANDED</u>
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AGIS SOFTWARE DEVELOPMENT LLC	§	
	§	CASE NO. 2:21-cv-00026-JRG
v.	§	(Member Case)
	§	
UBER TECHNOLOGIES, INC., d/b/a UBER	§	<u>JURY TRIAL DEMANDED</u>
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DEFENDANT’S MOTION FOR LEAVE TO FILE UNDER SEAL

Pursuant to Local Rule Local Rule CV5(a)(7) Defendant Lyft Inc. (“Lyft”) respectfully requests that the Court permit Lyft to file under seal Defendant Lyft’s Answer to Plaintiff’s Complaint and supporting exhibit.

In support of this motion for leave, Defendant states as follows:

1. Local Rule CV5(a)(7)(C) states:

(C) A motion to file document(s) under seal must be filed separately and immediately before the document(s) sought to be sealed. If the motion to seal is granted, the document will be deemed to have been filed as of the original date of its filing. If the motion is denied, the document will be struck. A motion to seal that is filed as a sealed document does not need to include the certification specified in Section (B) above.

2. The material Defendant Lyft seeks to file under seal was produced by Plaintiff AGIS and designated as RESTRICTED – ATTORNEYS’ EYES ONLY under the Protective Order in this case (Dkt. 96). and requires filing under seal to maintain AGIS’s confidentiality designation.

Accordingly, Defendant respectfully requests that the Court allow the Motion to be filed under seal in accordance with Local Rule CV(a)(7)(C).

Date: November 3, 2021

Respectfully submitted,

/s/ Jeremy Taylor

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Attorneys for Defendant Lyft, Inc.

CERTIFICATE OF CONFERENCE

I hereby certify that counsel for Defendants attempted to comply with the meet and confer requirement in Local Rule CV-7(h) by requesting a meet and confer with counsel for Plaintiff on November 1, 2021. Plaintiff's counsel did not respond to the request.

/s/ Jeremy Taylor
Jeremy Taylor

CERTIFICATE OF SERVICE

I hereby certify that counsel of record who are deemed to have consented to electronic service are being served this 3rd day of November 2021, with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3).

/s/ Jeremy Taylor
Jeremy Taylor