## IN THE UNITED STATES DISTRICT COURT WESTERN DISTRICT OF TEXAS WACO DIVISION

GENTEX CORPORATION and INDIGO TECHNOLOGIES, LLC,

Plaintiffs,

THALES VISIONIX, INC., Involuntary Plaintiff, Case No. 6:21-cv-00755-ADA

JURY TRIAL DEMANDED

v.

META PLATFORMS, INC. and META PLATFORMS TECHNOLOGIES, LLC, Defendants.

## **DEFENDANTS' UNOPPOSED MOTION TO SEAL**

Meta Platforms, Inc. and Meta Platforms Technologies, LLC (collectively, "Meta" or "Defendants") respectfully request that the Court seal Plaintiffs' Exhibit 28 to Plaintiffs' Opposition to Defendants' Motion to Transfer (Dkt. No. 61) ("Exhibit 28"), which was filed on May 20, 2022.

Exhibit 28 contains confidential information, including Meta employees' home addresses. Such information should not be publicly disclosed and should have been filed under seal. Accordingly, to preserve the confidentiality of that information, Meta requests that the Court grant this motion to seal Exhibit 28. Plaintiffs do not oppose this motion.

Dated: May 31, 2022

RM

<u>/s/ Joshua Glucoft</u> Jeanne M. Heffernan

Find authenticated court documents without watermarks at <u>docketalarm.com</u>.

Texas State Bar No. 24128395 KIRKLAND & ELLIS LLP 401 Congress Avenue Austin, TX 78701 Tel: (512) 678-9100 Fax: (512) 678-9101 jheffernan@kirkland.com

Ellisen Shelton Turner (*pro hac vice*) Joshua Glucoft (*admitted*) KIRKLAND & ELLIS LLP 2049 Century Park East, Suite 3700 Los Angeles, CA 90067 Tel: (310) 552-4200 Fax: (310) 552-5900 ellisen.turner@kirkland.com josh.glucoft@kirkland.com

Akshay S. Deoras (*pro hac vice*) KIRKLAND & ELLIS LLP 555 California Street San Francisco, CA 94104 Tel: (415) 439-1400 Fax: (415) 439-1500 akshay.deoras@kirkland.com

Paige Arnette Amstutz Texas State Bar No. 00796136 SCOTT, DOUGLASS & MCCONNICO, LLP 303 Colorado Street, Suite 2400 Austin, TX 78701 Tel: (512) 495-6300 Fax: (512) 495-6399 pamstutz@scottdoug.com

Counsel for Defendants Meta Platforms, Inc. and Meta Platforms Technologies, LLC

DOCKET

ALARM

Case 6:21-cv-00755-ADA Document 65 Filed 05/31/22 Page 3 of 3

## **CERTIFICATE OF SERVICE**

I hereby certify that, on May 31, 2022 all counsel of record who are deemed to have consented to electronic service are being served with a copy of the foregoing via the Court's CM/ECF system.

> /s/ Joshua Glucoft Joshua Glucoft

Δ