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13 Otto Trucking LLC

14 **UNITED STATES DISTRICT COURT**
15 **NORTHERN DISTRICT OF CALIFORNIA**
16 **SAN FRANCISCO DIVISION**

17 Waymo LLC,
18 Plaintiff,
19 v.
20 Uber Technologies, Inc.; Ottomotto LLC; Otto
Trucking LLC,
21 Defendants.
22

Case No. 3:17-cv-00939-WHA

**DEFENDANT OTTO TRUCKING'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL PORTIONS OF ITS
MOTION TO ENFORCE THE COURT'S
JUNE 7, 2017 ORDER (DKT. 563) AND TO
JOIN AND ADOPT CO-DEFENDANTS
UBER TECHNOLOGIES, INC. AND
OTTOMOTTO LLC'S MOTION TO
ENFORCE THE COURT'S JUNE 7, 2017
ORDER (DKT. 563)**

Date: August 17, 2017
Time: 8:00 a.m.
Courtroom: 8, 19th Floor
Judge: Honorable William Alsup
Trial Date: October 10, 2017

1 Pursuant to Civil Local Rules 7-11 and 79-5, Defendant Otto Trucking LLC (“Otto
 2 Trucking”) submits this motion for an order to file under seal exhibits to its Motion to Enforce the
 3 Court’s June 7, 2017 Order (Dkt. 563) and to Join and Adopt Co-Defendants Uber Technologies,
 4 Inc. and Ottomotto LLC’s Motion to Enforce the Court’s June 7, 2017 Order (Dkt. 563) (the
 5 “Motion”). Specifically, Otto Trucking requests an order granting leave to file under seal the
 6 confidential portions of the following document:

Document	Portions to Be Filed Under Seal
Exhibits 2 and 3 to the Declaration of Rachel M. Walsh	Highlighted Portions

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 10 Otto Trucking seeks to seal the highlighted portions of Exhibit 2 because Plaintiff Waymo
 11 LLC (“Waymo”) has designated the information “highly confidential” and “attorneys’ eyes only.”
 12 Otto Trucking does not oppose the merits of sealing the material designated by Waymo, and
 13 anticipates that Waymo will file declarations in accordance with Local Rule 79-5.

14 The highlighted portions of Exhibit 3 contain highly confidential, sensitive business
 15 information of Otto Trucking relating to terms of Otto Trucking’s agreements, corporate structure,
 16 and financial information. This highly confidential information is not publicly known, and its
 17 confidentiality is strictly maintained. If this information were made public, Otto Trucking’s
 18 competitors and counterparties would have insight into how Otto Trucking structures its business
 19 agreements, allowing them to modify their own business strategy. Otto Trucking’s competitive
 20 standing could be significantly harmed.

21 Otto Trucking’s request to seal is narrowly tailored to those portions of the Motion’s
 22 supporting documents that merit sealing.

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Dated: July 7, 2017

Respectfully submitted,

By: /s/ Rachel M. Walsh
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CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing with the Clerk of the Court for the United States District Court for the Northern District of California by using the CM/ECF system on July 7, 2017. I further certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

I certify under penalty of perjury that the foregoing is true and correct. Executed this 7th day of July 2017 in San Francisco, California.

/s/ Rachel M. Walsh
Rachel M. Walsh