

JOSHUA A. BASKIN, State Bar No. 294971  
THOMAS R. WAKEFIELD, State Bar No. 330121  
WILSON SONSINI GOODRICH & ROSATI  
Professional Corporation  
One Market Plaza  
Spear Tower, Suite 3300  
San Francisco, CA 94105-1126  
Telephone: (415) 947-2000  
Facsimile: (866) 974-7329  
Email: jbaskin@wsgr.com  
Email: twakefield@wsgr.com

Attorney for Defendant  
SUBSTACK, INC.

ELECTRONICALLY  
**FILED**  
*Superior Court of California,  
County of San Francisco*  
**11/27/2024**  
**Clerk of the Court**  
BY: SANDRA SCHIRO  
Deputy Clerk

SUPERIOR COURT OF THE STATE OF CALIFORNIA  
COUNTY OF SAN FRANCISCO

JOHN DOE, an individual,	)	CASE NO.: CGC-24-618681
	)	
Plaintiff,	)	<b>DEFENDANTS' MOTION TO</b>
	)	<b>FILE PORTIONS OF DEFENDANTS'</b>
v.	)	<b>OPPOSITION UNDER SEAL;</b>
	)	<b>MEMORANDUM OF POINTS AND</b>
SUBSTACK, INC., a Delaware corporation;	)	<b>AUTHORITIES IN SUPPORT</b>
AMAZON WEB SERVICES, INC., a	)	<b>THEREOF</b>
Delaware corporation; JACK POULSON, an	)	
individual; TECH INQUIRY, INC., a	)	Date: December 23, 2024
Delaware corporation; DOES 1-25, inclusive,	)	Time: 9:30a.m.
	)	Dept: 302
Defendants.	)	Before: Hon. Richard B. Ulmer, Jr.
	)	
	)	
	)	Action Filed: November 27, 2024
	)	Trial Date: None Set

1 **TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

2 PLEASE TAKE NOTICE that on December 23, 2024 at 9:30a.m. at Department 302  
3 Defendants will and hereby do move the Court pursuant to California Rules of Court 2.550 and  
4 2.551 to issue an order sealing the Declaration of Joshua A. Baskin in support of Defendant's  
5 Opposition ("Declaration") and the exhibits filed therewith ("Exhibits"), which have been lodged  
6 conditionally under seal.

7 Defendants file this Motion out of an abundance of caution. Defendants do not themselves  
8 believe any of the materials should be sealed. However, Plaintiff might believe that good cause  
9 exists for granting this Motion to Seal. *See* Declaration of Joshua A. Baskin, filed herewith.

10 This Motion is based on the accompanying Memorandum of Points and Authorities, the  
11 Declaration, the papers and records on file in this action, and such further evidence or argument as  
12 may be submitted at or before the time of the hearing.

13  
14 Dated: November 27, 2024

WILSON SONSINI GOODRICH & ROSATI  
Professional Corporation

16 By: /s/ Joshua A. Baskin  
Joshua A. Baskin  
17 E-mail: jlbaskin@wsgr.com

18 Attorney for Defendant  
Substack, Inc.  
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WILSON SONSINI GOODRICH & ROSATI  
Professional Corporation

By: /s/ Joshua A. Baskin  
Joshua A. Baskin

Attorney for Defendant  
Substack, Inc.