

ERVIN COHEN & JESSUP^{LLP}

1 Russell M. Selmont (SBN 252522)
rselmont@ecjlaw.com
2 Catherine A. Veeneman (SBN 301574)
cveeneman@ecjlaw.com
3 **ERVIN COHEN & JESSUP LLP**
9401 Wilshire Boulevard, Twelfth Floor
4 Beverly Hills, California 90212-2974
Tel: (310) 273-6333 / Fax: (310) 859-2325
5
6 Attorneys for Plaintiffs
JOSHUA PORTER and GULSEN KAMA

7
8 Cheryl Johnson-Hartwell (SBN 221063)
cjohnson-hartwell@bwsllaw.com
Keiko J. Kojima (SBN 206595)
9 kkojima@bwsllaw.com
10 **BURKE, WILLIAMS & SORENSEN, LLP**
444 South Flower Street, Suite 2400
Los Angeles, California 90071-2953
11 Tel: (213) 236-0600 / Fax: (213) 236-2700
12 Attorneys for Defendants
NORTHERN DATA US, INC. and
13 NORTHERN DATA US HOLDINGS, INC.

14
15 **UNITED STATES DISTRICT COURT**
16 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**
17

18 JOSHUA PORTER, an individual,
and GULSEN KAMA, an individual,

19 Plaintiffs,

20 v.

21 NORTHERN DATA US, INC., a
22 Delaware corporation; NORTHERN
DATA US HOLDINGS, INC., a
23 Delaware corporation; and DOES 1
through 10, inclusive,

24 Defendants.
25

Case No. 2:24-CV-03389-ODW (AGR_x)

Hon. Otis D. Wright II – Crtrm 5D

**JOINT STIPULATION REGARDING
DEFENDANTS’ APPLICATION TO
SEAL PORTIONS OF FIRST
AMENDED COMPLAINT**

ERVIN COHEN & JESSUP^{LLP}

1 WHEREAS, Plaintiffs filed their Complaint in Los Angeles Superior Court
2 on March 8, 2024.

3 WHEREAS, Defendants filed a Notice of Removal and removed the case to
4 federal court on or about April 24, 2024.

5 WHEREAS, Plaintiffs and Defendants filed Joint Stipulations extending
6 Defendants’ time to respond to the Complaint, which has been extended most
7 recently to June 7, 2024. [Doc. 17]

8 WHEREAS, Plaintiffs filed their First Amended Complaint in United States
9 District Court on June 14, 2024 (the “FAC”).

10 WHEREAS, Defendants filed their Application to provisionally file the First
11 Amended Complaint under seal on June 17, 2024 (the “Application”). [Doc. 21-23]

12 WHEREAS, the Court issued an order granting the Application on June 18,
13 2024, before any opposition was filed. [Doc. 24]

14 NOW THEREFORE, Plaintiffs and Defendants hereby stipulate as follows:

15 The parties agree that Plaintiffs reserve all rights to seek an order from the
16 court unsealing the FAC in its entirety and do not waive any arguments regarding
17 same. The parties agree that they will meet and confer on the issue and anticipate
18 presenting a proposed briefing schedule on the issue to the Court at or before the
19 first scheduling conference.

20 ///

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

ERVIN COHEN & JESSUP_{LLP}

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

IT IS SO STIPULATED.

DATED: July 3, 2024

ERVIN COHEN & JESSUP LLP

By: /s/ Russell M. Selmont
Russell M. Selmont
Attorneys for Plaintiffs JOSHUA PORTER
and GULSEN KAMA

DATED: July 3, 2024

BURKE, WILLIAMS & SORENSEN, LLP

By: /s/ Keiko J. Kojima
Cheryl Johnson-Hartwell
Keiko J. Kojima
Attorneys for Defendants NORTHERN
DATA US, INC., and NORTHERN DATA
US HOLDINGS, INC.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

ATTESTATION PURSUANT TO LOCAL RULE 5-4.3.4(a)(2)(i)

I, Russell M. Selmont, hereby attest that concurrence in this document’s content and the filing of this document has been obtained from each of the other signatories.

Dated: July 3, 2024

By: /s/ Russell M. Selmont
Russell M. Selmont

ERVIN COHEN & JESSUP_{LLP}

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

ERVIN COHEN & JESSUP^{LLP}

CERTIFICATE OF SERVICE

CENTRAL DISTRICT OF CALIFORNIA

Porter, et al. v. Northern Data US, Inc., et al.
Case No. 2:24-cv-03389-ODW (AGRx)

The undersigned certifies that on July 3, 2024, the following documents and all related attachments (“Documents”) were filed with the Court using the CM/ECF system.

JOINT STIPULATION REGARDING DEFENDANTS’ APPLICATION TO SEAL PORTIONS OF FIRST AMENDED COMPLAINT

Pursuant to L.R. 5-3.2, all parties to the above case and/or each attorneys of record herein who are registered users are being served with a copy of these Documents via the Court’s CM/ECF system. Any other parties and/or attorneys of record who are not registered users from the following list are being served by first class mail.

By: /s/ Russell M. Selmont
Russell M. Selmont