

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

GOOGLE LLC,

Plaintiff,

v.

DOES 1–25,

Defendants.

Civil Action No.:

**PLAINTIFF’S MOTION TO FILE APPENDICES A AND C UNDER SEAL
AND REDACT CERTAIN INVESTIGATIVE AND IDENTIFYING INFORMATION**

Plaintiff Google LLC, by and through undersigned counsel, hereby seeks leave under Federal Rule of Civil Procedure 5.2(d)–(e) to: (1) redact information identifying its declarants in order to protect those individuals’ privacy interests and prevent harassment or retaliation from Defendants; (2) redact portions of the Google Declaration and NAXO Declaration detailing investigative processes, including references to a specific domain, digital fingerprints, and email addresses connected to that domain; and (3) file Appendices A and C to the NAXO Declaration under seal and redact references to the content of Appendices A and C. Filing Appendices A and C under seal is necessary to preserve Google’s ability to seek effective injunctive relief and prevent further harm by the Defendants. Once Google obtains a temporary restraining order and effectuates its disruption plan pursuant thereto, it will move to unseal Appendices A and C and the references to Appendices A and C’s contents. The grounds for this motion are set forth in the accompanying memorandum of law.

Dated: June 12, 2026

Respectfully submitted,

/s/ Laura Harris

Laura Harris

KING & SPALDING LLP

1290 Avenue of the Americas, 14th Fl.

New York, NY 10104-0101

Tel: (212) 556-2100

Fax: (212) 556-2222

lharris@kslaw.com

Benjamin S. Softness

KING & SPALDING LLP

50 California Street, Suite 3300

San Francisco, CA 94111-4624

Tel: (415) 318-1251

Fax: (415) 318-1300

bsoftness@kslaw.com

Counsel for Plaintiff Google LLC