

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

DYSON TECHNOLOGY LIMITED,

Plaintiff,

v.

THE PARTNERSHIPS AND
UNINCORPORATED ASSOCIATIONS
IDENTIFIED ON SCHEDULE “A”,

Defendants.

Case No. 22-cv-05946

PLAINTIFF’S MOTION FOR LEAVE TO FILE UNDER SEAL

Dyson Technology Limited (“Dyson” or “Plaintiff”) files this Motion requesting leave to file the following documents under seal: (1) Schedule A attached to the Complaint, which lists the fully interactive e-commerce stores operating under the seller aliases (the “Seller Aliases”) and the e-commerce store urls under the Online Marketplaces; and (2) Exhibit 1 to the Complaint and Exhibit 2 to the Declaration of Giles Samuel Lane, which include screenshot printouts showing the e-commerce stores operating under the Seller Aliases.

In this action, Dyson is requesting temporary *ex parte* relief based on an action for design patent infringement. Sealing this portion of the file is necessary to prevent the Defendants from learning of these proceedings prior to the execution of the temporary restraining order. If Defendants were to learn of these proceedings prematurely, the likely result would be the destruction of relevant documentary evidence and the hiding or transferring of assets to foreign jurisdictions, which would frustrate the purpose of the underlying law and would interfere with this Court’s power to grant relief. Once the temporary restraining order has been served on the relevant parties and the requested actions are taken, Dyson will move to unseal these documents.

Dated this 27th day of October 2022.

Respectfully submitted,

/s/ Justin R. Gaudio

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