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X HOLDINGS CORP.; X CORP.; ELON MUSK

13
14 UNITED STATES DISTRICT COURT
15 NORTHERN DISTRICT OF CALIFORNIA

16
17 SARAH ANOKE, CATHERINE BONN,
ISABELLE CANNELL, MELANIE EUSEBIO,
18 SAMANTHA FESTEJO, CARLOS MOISES
ORTIZ GOMEZ, DAWN HOISE, WAYNE
19 KRUG, LAURENT LUCE, PATRICK
O'CONNELL, JENNIFER RYAN, JAIME
20 SENA, JAMES SHOBE, KARYN
THOMPSON, AND CRISTIAN ZAPATA,

Case No. 3:23-cv-02217-SI

**REPLY IN SUPPORT OF
RESPONDENTS' ADMINISTRATIVE
MOTION TO FILE UNDER SEAL**

21
22 Petitioners,

23 v.

24 TWITTER, INC., X HOLDINGS I, INC., X
HOLDINGS, CORP, X CORP, AND ELON
25 MUSK,

26 Respondents.
27
28

1 Respondents X Holdings Corp., on its own behalf and as successor in interest to named
2 Respondent X Holdings I, Inc. (“X Holdings”), X Corp., on its own behalf and as successor in
3 interest to named Respondent Twitter, Inc. (“Twitter”), and Elon Musk (“Respondents”) submit
4 this brief Reply in response to Petitioners’ Opposition to Respondents’ Administrative Motion to
5 Seal to reiterate and clarify the relief sought in the Administrative Motion.

6 Respondents do not seek an *in camera* review of the Supplemental Corporate Disclosure
7 Statement (the “Statement”). Rather, Respondents are willing to provide the unredacted
8 Statement to Petitioners’ counsel, subject to and conditioned upon Petitioners and their counsel
9 being bound not to disclose to any other persons or otherwise make public any of the
10 substance/contents of the unredacted Statement. For obvious reasons, the entire purpose of the
11 Administrative Motion to Seal would be defeated if Petitioners and their counsel had the
12 opportunity to disclose and make public the unredacted Statement. As a result and to clarify the
13 requested relief, Respondents’ Motion for Administrative Relief seeks to seal from the public
14 record the redacted portion of the Statement. The unredacted Statement may be shared with
15 Petitioners’ counsel subject to Petitioners’ counsel and their clients being bound to maintain the
16 confidentiality of the Statement.

17 Dated: June 12, 2023

MORGAN, LEWIS & BOCKIUS LLP

19 By /s/ Eric Meckley

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X HOLDINGS CORP.; X CORP.; ELON MUSK