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19 **UNITED STATES DISTRICT COURT**  
20 **NORTHERN DISTRICT OF CALIFORNIA**  
21 **SAN JOSE DIVISION**

22 WENDOVER PRODUCTIONS, LLC, a Limited  
23 Liability Company; BUSINESSING, LLC, a  
24 Limited Liability Company; THE  
25 CHARISMATIC VOICE, LLC, a Limited  
Liability Company; CLEARVISION MEDIA,  
INC.; and GEAR LIVE MEDIA, LLC, a Limited  
Liability Company

26 Plaintiffs,

27 v.

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Case No.: 5:24-cv-09470-BLF

**UNOPPOSED ADMINISTRATIVE**  
**MOTION TO CONSIDER WHETHER**  
**CASES SHOULD BE RELATED**  
**PURSUANT TO CIVIL LOCAL RULES 3-**  
**12 AND 7-11**

1 PAYPAL, INC.,  
2 Defendant.

3 ELI SILVA AND ASHLEY GARDINER, on  
4 behalf of themselves and all others similarly  
5 situated,

6 Plaintiffs,

7 v.

8 PAYPAL HOLDINGS, INC., a California  
9 Corporation, PAYPAL, INC., a California  
10 Corporation,

11 Defendants.

Case No.: 5:24-cv-09510-SVK

12 GamersNexus LLC,

13 Plaintiff,

14 v.

15 PAYPAL HOLDINGS, INC., a California  
16 Corporation, PAYPAL, INC., a California  
17 Corporation,

18 Defendant.

Case No.: 5:25-cv-00114-BLF

19 CLAUDIA JAYNE YOUNG, Individually and  
20 on Behalf of All Others Similarly Situated,

21 Plaintiff,

22 v.

23 PAYPAL, INC. and PAYPAL HOLDINGS,  
24 INC.,

25 Defendant.

Case No.: 5:25-cv-00124-EKL

1 **TO THE COURT AND ALL PARTIES AND THEIR COUNSEL OF RECORD:**

2 PLEASE TAKE NOTICE that, pursuant to Civil Local Rules 3-12 and 7-11 of the Northern  
3 District of California, Plaintiffs Wendover Productions, LLC (“Wendover”), Businessing, LLC  
4 (“Businessing”); The Charismatic Voice, LLC (“Charismatic”); Clearvision Media, Inc.  
5 (“Clearvision”); and Gear Live Media, LLC (“Gear”), Eli Silva, and Ashley Gardiner; GamersNexus  
6 LLC; and Claudia Jane Young file this administrative motion to consider whether *Silva v. PayPal*,  
7 No. 5:24-cv-09510 (N.D. Cal.) (the “Silva Action”), filed on December 30, *GamersNexus LLC v.*  
8 *Paypal Holdings, Inc., et al.*, No. 5:25-cv-00114 (N.D. Cal.) (the “GamersNexus Action”), filed on  
9 January 3, 2025, and *Young v. Paypal, Inc., et al.*, No. 5:25-cv-00124 (N.D. Cal.) (the “Young  
10 Action”), filed on January 3, 2025 should be related to *Wendover, et al. v. PayPal*, No. 5:24-cv-09470  
11 (N.D. Cal.) (the “Wendover Action”), filed on December 29, 2024.

12 Civil Local Rule 3-12 provides that “[a]n action is related to another when: (1) The actions  
13 concern substantially the same parties, property, transaction or event; and (2) It appears likely that  
14 there will be an unduly burdensome duplication of labor and expense or conflicting results if the cases  
15 are conducted before different Judges.” The Silva, GamersNexus, Young, and Wendover Actions  
16 name overlapping Defendants and include substantially similar factual allegations regarding PayPal’s  
17 use of the Honey browser extension to allegedly misappropriate sales commissions that should be  
18 awarded to online marketers, including Plaintiffs and Class members. The cases involve overlapping  
19 class definitions and both bring claims for tortious interference, conversion, unjust enrichment,  
20 violations of California’s Unfair Competition Law, and injunctive relief. Thus, each action will  
21 require adjudication of the same or substantially similar questions of law and fact. Under these  
22 circumstances, separate assignment of these actions would likely create a duplication of labor and  
23 expenses and potentially lead to conflicting results. Relating these actions, on the other hand, would  
24 conserve judicial resources and ensure consistent results. The parties and the Court will benefit from  
25 these efficiencies should the Court find these actions to be related.

1 Dated: January 7, 2025

Respectfully submitted,

2 By: /s/ Adam E. Polk

By: /s/ John P. Kristensen

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**ATTESTATION OF FILER**

I, Adam E. Polk, am the ECF user whose ID and password are being used to file this document.  
In compliance with Civil L.R. 5-1(i)(3), I hereby attest that all counsel have concurred in this filing.

Dated: January 7, 2025

/s/ Adam E. Polk  
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