UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
Case No.: 9:14-cv-80651-MIDDLEBROOKS/Brannon

ADVANCED GROUND INFORMATION SYSTEMS, INC.,

Plaintiff.

v.

LIFE360, INC.,

Defendant.

FILED by PE D.C.
FEB 23 2015
STEVEN M. LARIMORE
CLERK U.S. DIST. CT.
S.D. of FLA. - MIAMI

PLAINTIFF ADVANCED GROUND INFORMATION SYSTEMS, INC.'S UNOPPOSED MOTION TO SEAL MOTION *IN LIMINE* NO. 8

Plaintiff Advanced Ground Information Systems, Inc. ("AGIS"), by and through its undersigned counsel, respectfully moves the Court for an order to seal the full, unredacted version of Plaintiff Advanced Ground Information Systems, Inc.'s Motion *in Limine* No. 8 ("MIL No. 8") with its Exhibits 2, 4 and 5, filed contemporaneously herewith.

On February 19, 2015, in accordance with the Court's Scheduling Order [DE 63], AGIS filed its motions *in limine* [DE 112]. MIL No. 8 was redacted in part to preserve the confidentiality of Life360's source code, and information and testimony regarding that source code, which has been designated as highly confidential by Life360 pursuant to the Stipulated Protective Order [DE 64]. The parties met and conferred to determine which portions of AGIS's motions *in limine* and exhibits Life360 requires be maintained as confidential. Only the redactions in MIL No. 8 and its exhibits contain information that is material to the merits of the relief sought by AGIS. Therefore, AGIS seeks to file the unredacted version of MIL No. 8 and its accompanying exhibits under seal.

Life360 does not oppose this motion to seal. AGIS's motions *in limine* were timely filed on February 19, 2015, and Life360 was served with a full, unredacted version of AGIS's motions and exhibits the same day. A public version of AGIS's MIL No. 8 and its exhibits are already of record in this case [DE 112, 113]. Those public versions contain minimal redactions of only the information that Life360 maintains is confidential. Therefore, AGIS respectfully requests that the Court enter an order to seal its MIL No. 8 and accompanying exhibits. AGIS respectfully requests that these documents be sealed until conclusion of this case and that the sealed documents be returned to AGIS at the expiration of the sealing period.

Certificate of Compliance with Local Rule 7.1(a)(3)

Counsel for Plaintiff hereby certifies that, pursuant to Local Rule 7.1(a)(3), counsel for Plaintiff has conferred with all parties or non-parties who may be affected by the relief sought in the motion in a good faith effort to resolve the issues raised in this motion. Counsel for Defendant does not oppose this motion to seal.

Date: February 23, 2015

Respectfully submitted,

George E. Badenoch*
New York Bar No. 1165323
E-mail: gbadenoch@kenyon.com
Mark A. Hannemann*
New York Bar No. 2770709
E-mail: mhannemann@kenyon.com
Thomas Makin*
New York Bar No. 3953841
E-mail: tmakin@kenyon.com
Rose Cordero Prey*
New York Bar No. 4326591
E-mail: rcordero@kenyon.com
Vincent Rubino, III*
New York Bar No. 4557435
E-mail: vrubino@kenyon.com
KENYON & KENYON LLP
One Broadway
New York, NY 10004-1007
Telephone: (212) 425-7200
Facsimile: (212) 425-5288

* *admitted pro hac vice*

and

Ury Fischer
Florida Bar No. 048534
E-mail: ufischer@lottfischer.com
Adam Diamond
Florida Bar No. 091008
E-mail: adiamond@lottfischer.com
LOTT & FISCHER, PL
355 Alhambra Circle, Suite 1100
Coral Gables, FL 33134
Telephone: (305) 448-7089
Facsimile: (305) 446-6191

Attorneys for Plaintiff
Advanced Ground Information Systems, Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on February 23, 2015, I filed the foregoing with the Clerk of the Court via hand delivery. I further certify that the foregoing document was served on all counsel of record identified on the attached Service List via U.S. Mail and electronic mail.

Adam Diamond

SERVICE LIST

Advanced Ground Information Systems, Inc. v. Life360, Inc.
United States District Court, Southern District of Florida
CASE NO. 9:14-CV-80651-DMM

SHUTTS & BOWEN, LLP Eric C. Christu Florida Bar No. 434647 E-mail: echristu@shutts.com Daniel Barsky Florida Bar No. 25713 E-mail: dbarsky@shutts.com 525 Okeechobee Blvd., Suite 1100 West Palm Beach, FL 33401 Telephone: (561) 835-8500 Facsimile: (561) 650-8530	
THE WEBB LAW FIRM Kent E. Baldauf, Jr.* E-mail: kbaldaufjr@webblaw.com Bryan P. Clark* E-mail: bclark@webblaw.com Cecilia R. Dickson* E-mail: cdickson@webblaw.com James L. Bosco, Jr.** E-mail: jbosco@webblaw.com One Gateway Center 420 Ft. Duquesne Blvd. Suite 1200 Pittsburgh, PA 15222 Telephone: (412) 471-8815 ***Attorneys for Defendant Life360, Inc.***	