IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

COURTALERT.COM, INC.,

Plaintiff,

v.

AMERICAN LEGALNET, INC., EREZ BUSTAN, and ROBERT LOEB,

Defendants.

No. 1:20-cv-07739

APPLICATION GRANTED SO ORDERED A Jan VERNON S. BRODERICK

U.S.D.J. 11/30/2020

The Clerk of Court is directed to terminate Doc. 11. In accordance with Rule 5.B of my Individual Rules, the parties are directed to meet and confer with regard to the redacted document and file a joint letter explaining the reasons for seeking to file the document in redacted form by December 9, 2020.

MOTION TO REMOVE AND/OR SEAL INCORRECTLY FILED DOCUMENT

Defendants American LegalNet, Inc., Erez Bustan, and Robert Loeb ("Defendants") respectfully move that an order be granted to remove and/or seal Document 11-4 from the docket on the grounds that a portion of the document was incorrectly filed. Document 11-4 contains information that Plaintiff CourtAlert.com, Inc. ("Plaintiff") contends is confidential. While Defendants dispute that the information is confidential and protected from disclosure, a redacted version of the document should have been filed given the dispute between the parties.

On November 25, 2020, Defendants filed Document 11, a Motion to Dismiss, along with several supporting documents, including Document 11-4. Later that same day, Plaintiff's counsel contacted Defendants' counsel and requested that Defendants' counsel move to withdraw Document 11-4 because it purportedly contained confidential information. While Defendants disagree that the exhibit contains confidential information protected from disclosure, Plaintiff's position now requires that Defendants move to remove the exhibit from the docket. The ECF Helpdesk was closed for the day when Defendants' counsel received Plaintiff's

counsel's request to remove the document, but Defendants' counsel will contact the Helpdesk to lock the document upon its reopening.

Accordingly, Defendants respectfully request that Document No. 11-4 be sealed and/or permanently deleted from the docket. Immediately following this filing, Defendants will refile a redacted version of the document.

Dated: November 25, 2020 Respectfully Submitted,

GREENBERG TRAURIG, LLP

/s/ Ryan P. O'Connor

RYAN P. O'CONNOR ROBERT H. BERNSTEIN (pro hac vice forthcoming)

Attorneys for Defendants American LegalNet, Inc., Erez Bustan, and Robert Loeb