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13 Attorneys for Plaintiff
Chegg, Inc.

14
15 UNITED STATES DISTRICT COURT
16 NORTHERN DISTRICT OF CALIFORNIA
17 SAN FRANCISCO DIVISION
18

19 CHEGG, INC.,

20 Plaintiff,

21 v.

22 VIKASA SWAMI, A/K/A @THEVIKASH,
AND JOHN DOES 1-3,

23 Defendant.
24
25
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27
28

Case No. 3:22-cv-07326-CRB

**CHEGG INC.'S ADMINISTRATIVE
MOTION TO FILE *EX PARTE*
APPLICATION FOR TEMPORARY
RESTRAINING ORDER AND ORDER
TO SHOW CAUSE FOR
PRELIMINARY INJUNCTION UNDER
SEAL**

**[PROPOSED] ORDER LODGED
HEREWITH**

**NO HEARING REQUIRED
[L.R. 7-11(d)]**

Pursuant to Civil Local Rules 7-11(a), Chegg, Inc. (“Chegg”) hereby requests an order of this Court authorizing the filing under seal of the below-identified documents in support of Chegg’s Ex Parte Application for Temporary Restraining Order and Order to Show Cause for Preliminary Injunction.

Document	Section of Document Subject to Sealing	Ruling Sought
Chegg, Inc.’s Ex Parte Application for Temporary Restraining Order and Order to Show Cause for Preliminary Injunction	Document to be Sealed in Entirety	Granted
Declaration of Ryan C. Stevens in Support of Chegg, Inc.’s Ex Parte Application for Temporary Restraining Order and Order to Show Cause for Preliminary Injunction	Document to be Sealed in Entirety	Granted
Exhibits A-C Attached to the Declaration of Ryan Stevens in Support of Chegg’s Ex Parte Application for Temporary Restraining Order and Order to Show Cause for Preliminary Injunction	Document to be Sealed in Entirety	Granted
[Proposed] Order Granting Chegg, Inc.’s Ex Parte Application for Temporary Restraining Order and Order to Show Cause for Preliminary Injunction	Document to be Sealed in Entirety	Granted

I. BACKGROUND

Chegg has filed an application for an ex parte temporary restraining order (the “TRO”). As set forth in the TRO and supporting Declaration, compelling reasons exist to seal those materials so as to maintain the status quo.¹

II. COMPELLING REASONS EXIST TO SEAL CHEGG’S EX PARTE APPLICATION FOR TEMPORARY RESTRAINING ORDER AND ACCOMPANYING PLEADINGS AND EVIDENCE

A court may permit a party to preserve judicial records under seal if the party articulates

¹ The Declaration of Ryan Stevens supports this motion to seal pursuant to Local Rules 7-11(a) and 79-5(c).

1 “compelling reasons” for keeping them sealed. *Kamakana v. City & County of Honolulu*, 447 F.3d
2 1172, 1179 (9th Cir. 2006). Courts find compelling reasons to seal information where “notice to
3 the defendant would render fruitless the further prosecution of this action,” *Reno Air Racing Ass’n,*
4 *Inc. v. McCord*, 452 F.3d 1126, 1131 (9th Cir. 2006) (“*Reno Air*”), for example, in the trademark
5 context where an alleged infringer is likely to dispose of the infringing goods before the hearing.
6 *See Matter of Vuitton et Fils S.A.*, 606 F.2d 1, 5 (2d Cir. 1979). *See also Consumer Source Holding,*
7 *Inc. v. Does 1-24*, No. 1:13-CV-1512 AJT/JFA, 2014 WL 2967942, at *2 (E.D. Va. July 1, 2014)
8 (sealing a TRO in a case alleging violations of the Computer Fraud and Abuse Act and seeking the
9 transfer of web domains); *See also Microsoft Corp. v. Does*, No. 1:19CV01582 (LO/JFA), 2020
10 WL 13894281, at *1 (E.D. Va. Nov. 20, 2020), *report and recommendation adopted sub nom.*
11 *Microsoft Corp. v. Does*, 1-2, No. 1:19-CV-01582, 2021 WL 12124650 (E.D. Va. Apr. 5, 2021).

12 The facts and conduct detailed in Chegg’s TRO and the Stevens Declaration establish
13 compelling reasons for sealing the documents previously listed. Based on the sensitive and
14 confidential nature of the content of each of the listed documents, Chegg respectfully requests this
15 Court order the filing of these documents and exhibits under seal as of the date they were lodged
16 with this Court.

17 Dated: December 19, 2023

COOLEY LLP

19 By: /s/ John Hemann

20 John Hemann

21 Attorneys for Plaintiff