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6x7 Networks, LLC and Benjamin Cannon

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11 SUPERIOR COURT OF THE STATE OF CALIFORNIA
12 COUNTY OF SAN FRANCISCO
13

14 6x7 NETWORKS, LLC, a Delaware limited
liability company,

15 Plaintiff,

16 vs.

17 SUDO SECURITY GROUP, INC., a
18 Delaware corporation doing business as
Guardian; STEVE RUSSELL, an individual;
19 SEAN SNYDER, an individual, and DOES 1
through 100, inclusive,

20 Defendants.
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22 SUDO SECURITY GROUP, INC., a
Delaware corporation,

23 Cross-Complainant,

24 vs.
25

26 6x7 NETWORKS, LLC, a Delaware limited
liability company, and BENJAMIN
CANNON, an individual,

27 Cross-Defendants.
28

Case No. CGC-19-581498

**CROSS-DEFENDANTS 6X7 NETWORKS,
LLC AND BENJAMIN CANNON'S
AMENDED NOTICE OF MOTION AND
MOTION TO QUASH DEPOSITION
SUBPOENA OF SUDO SECURITY
GROUP, INC. TO ANDREW WATTERS
AND/OR FOR A PROTECTIVE ORDER**

Date: February 26, 2021

Time: 9:00 am

Dept.: 301

Action Filed:

December 13, 2019

Trial Date:

None Set

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TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that on February 26, 2021, in Dept. 301 of the above-captioned court located at 400 McAllister Street, San Francisco, CA 94102, or as soon thereafter as can be heard, Plaintiff and Cross-Defendants 6x7 Networks, LLC and Benjamin Cannon’s (“6x7”) will and do hereby move for a motion to quash a deposition subpoena for production of documents issued by Defendant and Cross-Complainant Sudo Security Group (“Sudo”) to Andrew Watters and/or for a protective order pursuant to California Code of Civil Procedure section 1987.1, Evidence Code sections 954 and 1060, and Business and Professions Code section 6068, subdivision (e)(1).

6x7 moves for an order to quash the a deposition subpoena for production of documents and/or for a protective order on the following grounds:

- 1. The subpoena improperly seeks privileged and confidential information and Plaintiff could obtain the information by other means; and
- 2. The subpoena improperly seeks trade secrets.

This motion to quash the deposition subpoena for production of documents and/or for a protective order is based on this Amended Notice of Motion, the Notice of Motion filed on January 25, 2021, the Memorandum of Points and Authorities in support of this motion filed on January 25, 2021, the Declarations of Jessica Beeler and Lady B. Cannon filed on January 25, 2021, the Supplemental Declaration of Jessica Beeler filed concurrently herewith, the Separate Statement filed concurrently herewith, and any document or oral argument that may be presented by 6x7 at the time of the hearing on this Motion.

DATED: January 27, 2021

LEWIS BRISBOIS BISGAARD & SMITH LLP



By: _____
BRIAN SLOME
JESSICA L. BEELER
Attorneys for Cross-Defendants
6x7 Networks, LLC and Benjamin Cannon

1 CALIFORNIA STATE COURT PROOF OF SERVICE
2 6x7 Networks, LLC v. Sudo Security Group, Inc., et al.
3 San Francisco County Superior Court, Case No. CGC-19-581498

4 STATE OF CALIFORNIA, COUNTY OF ALAMEDA

5 At the time of service, I was over 18 years of age and not a party to this action. My
6 business address is 333 Bush Street, Suite 1100, San Francisco, CA 94104-2872.

7 On January 27, 2021, I served true copies of the following document(s):

8 **CROSS-DEFENDANTS 6X7 NETWORKS, LLC AND BENJAMIN CANNON'S
9 AMENDED NOTICE OF MOTION AND MOTION TO QUASH DEPOSITION
10 SUBPOENA OF SUDO SECURITY GROUP, INC. TO ANDREW WATTERS
11 AND/OR FOR A PROTECTIVE ORDER.**

12 I served the documents on the following persons at the following addresses (including fax
13 numbers and e-mail addresses, if applicable):

<p>14 Attorneys for Plaintiff, 6x7 Networks, LLC</p> <p>15 Marc A. Indeglia 16 Indeglia PC 17 13274 Fiji Way, Suite 250 18 Marina del Rey, California 90292 19 Tel.: (310) 982-2720 20 Email: marc@indegliapc.com</p>	<p>21 Attorneys for Defendant/Cross- 22 Complainant Sudo Security Group</p> <p>23 Richard D. Lutkus 24 M. Ryan Pinkston 25 Seyfarth Shaw LLP 26 560 Mission Street, 31st Floor 27 San Francisco, California 94105 28 Tel.: (415) 397-2823 Fax: (415) 397-8549 Email: rlutkus@seyfarth.com Email: rpinkston@seyfarth.com</p>
<p>29 Andrew G. Watters 30 118 South Blvd. 31 San Mateo, CA 94402</p> <p>32 <i>Via U.S. Mail</i></p>	<p>33 Nationwide Legal LLC 34 859 Harrison Street Suite A 35 San Francisco, CA 94107</p> <p>36 <i>Via U.S. Mail</i></p>

37 The documents were served by the following means:

38 (BY U.S. MAIL) I enclosed the documents in a sealed envelope or package addressed to
39 the persons at the addresses listed above (TO ANDREW G. WATTERS and
40 NATIONWIDE LEGAL only) and:

41 Deposited the sealed envelope or package with the U.S. Postal Service, with the
42 postage fully prepaid.

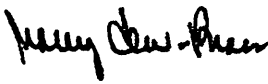
43 Placed the envelope or package for collection and mailing, following our ordinary
44 business practices. I am readily familiar with the firm's practice for collection and processing
45 correspondence for mailing. Under that practice, on the same day that correspondence is placed
46 for collection and mailing, it is deposited in the ordinary course of business with the U.S. Postal
47 Service, in a sealed envelope or package with the postage fully prepaid.

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(BY ELECTRONIC SERVICE VIA FIRST LEGAL) Based on a court order, I caused the above-entitled document to be served through First Legal at <https://firstlegal.com> addressed to all parties appearing on the electronic service list for the above-entitled case. The service transmission was reported as complete and a copy of the First Legal Filing Receipt Page/Confirmation will be filed, deposited, or maintained with the original document in this office.

(BY E-MAIL OR ELECTRONIC TRANSMISSION) Based on a court order or an agreement of the parties to accept service by e-mail or electronic transmission, I caused the documents to be sent from e-mail address Nancy.Lew-Pham@lewisbrisbois.com to the persons at the e-mail addresses listed above. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on January 27, 2021, at San Francisco, California.



Nancy Lew-Pham