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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.

21
22 SUDO SECURITY GROUP, INC., a
Delaware corporation,

23 Cross-Complainant,

24 vs.

25 6x7 NETWORKS, LLC, a Delaware limited
26 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
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 _____, in Dept. _ in the above-captioned court at ____, 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 deposition subpoena for production of documents and/or for a protective order is based on this notice of motion, the memorandum of points and authorities in support of this motion, the concurrently-filed Declarations of Jessica Beeler and Lady B. Cannon filed in support of this motion, all concurrently-filed papers with their supporting papers, and any document or oral argument that may be presented by 6x7 at the time of the hearing on this Motion.

DATED: January 25, 2021

LEWIS BRISBOIS BISGAARD & SMITH LLP



By:

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

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

STATE OF CALIFORNIA, COUNTY OF ALAMEDA

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

On January 25, 2021, I served true copies of the following document(s): NOTICE OF MOTION TO QUASH DEPOSITION SUBPOENA

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

Attorneys for Plaintiff, 6x7 Networks, LLC	Attorneys for Defendant/Cross-Complainant Sudo Security Group
Marc A. Indeglia Indeglia PC 13274 Fiji Way, Suite 250 Marina del Rey, California 90292 Tel.: (310) 982-2720 Email: marc@indegliapc.com	Richard D. Lutkus M. Ryan Pinkston Seyfarth Shaw LLP 560 Mission Street, 31st Floor San Francisco, California 94105 Tel.: (415) 397-2823 Fax: (415) 397-8549 Email: rlutkus@seyfarth.com Email: rpinkston@seyfarth.com

The documents were served by the following means:

(BY U.S. MAIL) I enclosed the documents in a sealed envelope or package addressed to the persons at the addresses listed above and:

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

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

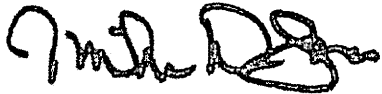
(BY ELECTRONIC SERVICE VIA FIRST LEGAL) Based on a court order, I caused the above-entitled document to be served through First Legal at <https://firstlegal.com> addressed to all parties appearing on the electronic service list for the above-entitled case. The service transmission was reported as complete 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 mike.lewis@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 unsuccessful.

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I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on January 25, 2021, at Oakland, California.



Mike D. Lewis