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9 Attorneys for Cross-Defendants
6x7 Networks, LLC and Benjamin Cannon

10
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
SEPARATE STATEMENT IN SUPPORT
OF 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

1 Plaintiff and Cross-Defendants 6x7 Networks, LLC and Benjamin Cannon's ("6x7")
2 submit this Separate Statement in support of its motion to quash a deposition subpoena for
3 production of documents issued by Defendant and Cross-Complainant Sudo Security Group
4 ("Sudo") to Andrew Watters and/or for a protective order, pursuant to California Rules of Court,
5 Rule 3.1345.

6 **SEPARATE STATEMENT IN SUPPORT OF MOTION TO QUASH**

7 **I. SUBPOENA LANGUAGE**

8 The Subpoena contains the following language:

9 "1. You are ordered to produce the business records described in item 3, as follows:

10 To (name of deposition officer): Nationwide Legal LLC

11 On (date): January 6, 2021

12 At (time): Before 4:00 PM

13 Location (address): 859 Harrison Street, Suite A, San Francisco, CA 94107

14 by delivering a true, legible, and durable copy of the business records described in item 3,
15 enclosed in a sealed inner wrapper with the title and number of the action, name of witness, and
16 date of subpoena clearly written on it. The inner wrapper shall then be enclosed in an outer
17 envelope or wrapper, sealed, and mailed to the deposition officer at the address in item 1.

18 2. The records are to be produced by the date and time shown in item 1 (but not
19 sooner than 20 days after the issuance of the deposition subpoena, or 15 days after service,
20 whichever date is later). Reasonable costs of locating records, making them available or copying
21 them, and postage, if any, are recoverable as set forth in Evidence Code section 1563(b). The
22 records shall be accompanied by an affidavit of the custodian or other qualified witness pursuant
23 to Evidence Code section 1561.

24 3. The records to be produced are described as follows (if electronically stored
25 information is demanded, the form or forms in which each type of information is to be produced
26 may be specified): See Attachment A."

27 //

28 //

1 **II. ATTACHMENT A**

2 **A. Sudo's "Attachment A" offers the following definitions:**

3 **DEFINITIONS**

4 A. The term "documents" means all "writings" as that term is defined in California
5 Evidence Code section 250, and include the original or a copy of handwriting, typewriting,
6 printing, photostating, photocopying, and every other means of recording upon any tangible thing,
7 any form of communication or representation, including letters, words, pictures, sounds, or
8 symbols, or combinations thereof, including without limitation, correspondence, memoranda,
9 notes, diaries, statistics, letters, telegrams, minutes, contracts, reports, studies, checks,
10 statements, receipts, returns, summaries, pamphlets, books, charts, maps, inter-office and intra-
11 office communications, electronic mail (E-mail), notations of any sort of conversation, bulletins,
12 printed matter, computer printouts, teletypes, telefax, worksheets and drafts, alterations,
13 modifications, changes or amendments of any of the foregoing, graphic or aural records or
14 representations of any kind (including without limitation, photographs, charts, graphs, microfiche,
15 videotape, recordings, motion pictures) and electronic, mechanical or electric records or
16 representations of any kind (including without limitation: tapes, cassettes, mag cards, discs and
17 recordings). The term "documents" does not include consumer or employee records, and no such
18 records are requested.
19
20

21 **B. Sudo's "Attachment A" sets forth the following "DOCUMENTS TO BE**
22 **PRODUCED", followed by 6x7's response to each category of documents:**

23 **SUDO'S REQUEST:**

24 1. All documents relating to Benjamin Cannon's and/or 6x7 Networks LLC's access
25 to or ownership of rights to "dark fiber" or rooftops to provide internet or data services.

26 **6x7'S RESPONSE:**

27 6x7, a data services provider, has sued Sudo for breach of contract and related claims
28 based on Sudo's failure to pay for agreed-upon data services. Sudo cross-complained alleging

1 fraud-related claims regarding the formation of the parties' agreement(s) and whether 6x7 was
2 capable of providing the agreed-upon services.

3 The subject of the subpoena at issue, Andrew Watters, is former general counsel for 6x7.
4 Sudo, which 6x7's opponent in this litigation, has subpoenaed records from 6x7's former attorney
5 with knowledge that Andrew Watters has initiated his own civil action now pending against 6x7
6 based on claims similar to those raised in the above-captioned action, and therefore Sudo knows
7 that Andrew Watters' interests are adverse to those of 6x7. Sudo has issued a subpoena to 6x7's
8 former legal counsel contrary to the general reluctance of California courts to allow depositions of
9 opposing counsel. Additionally, this category of records sought by the subpoena is overbroad and
10 encompasses irrelevant, privileged, non-discoverable information. The documents sought include
11 documents containing trade secrets. (Evid. Code § 1060.) The documents sought encompass
12 confidential and/or attorney-client privileged information. (Evid. Code § 954; B&P Code § 6068,
13 subd. (e)(1).) The Discovery Act explicitly restricts this type of discovery.

14 **SUDO'S REQUEST:**

15 2. All documents relating to Benjamin Cannon's and/or 6x7 Networks LLC's account
16 and amounts owed to Wave Broadband from January 1, 2019, to October 31, 2019, including,
17 without limitation, Wave Broadband's notice of amounts outstanding and termination of services.

18 **6x7'S RESPONSE:**

19 6x7, a data services provider, has sued Sudo for breach of contract and related claims
20 based on Sudo's failure to pay for agreed-upon data services. Sudo cross-complained alleging
21 fraud-related claims regarding the formation of the parties' agreement(s) and whether 6x7 was
22 capable of providing the agreed-upon services.

23 The subject of the subpoena at issue, Andrew Watters, is former general counsel for 6x7.
24 Sudo, which 6x7's opponent in this litigation, has subpoenaed records from 6x7's former attorney
25 with knowledge that Andrew Watters has initiated his own civil action now pending against 6x7
26 based on claims similar to those raised in the above-captioned action, and therefore Sudo knows
27 that Andrew Watters' interests are adverse to those of 6x7. Sudo has issued a subpoena to 6x7's
28 former legal counsel contrary to the general reluctance of California courts to allow depositions of

1 opposing counsel. Additionally, this category of records sought by the subpoena is overbroad and
2 encompasses irrelevant, privileged, non-discoverable information. The documents sought include
3 documents containing trade secrets. (Evid. Code § 1060.) The documents sought encompass
4 confidential and/or attorney-client privileged information. (Evid. Code § 954; B&P Code § 6068,
5 subd. (e)(1).) The Discovery Act explicitly restricts this type of discovery.

6 **SUDO'S REQUEST:**

7 3. All documents relating to Benjamin Cannon's and/or 6x7 Networks LLC's account
8 and amounts owed to Cogent from July 1, 2019, to October 31, 2019.

9 **6x7'S RESPONSE:**

10 6x7, a data services provider, has sued Sudo for breach of contract and related claims
11 based on Sudo's failure to pay for agreed-upon data services. Sudo cross-complained alleging
12 fraud-related claims regarding the formation of the parties' agreement(s) and whether 6x7 was
13 capable of providing the agreed-upon services.

14 The subject of the subpoena at issue, Andrew Watters, is former general counsel for 6x7.
15 Sudo, which 6x7's opponent in this litigation, has subpoenaed records from 6x7's former attorney
16 with knowledge that Andrew Watters has initiated his own civil action now pending against 6x7
17 based on claims similar to those raised in the above-captioned action, and therefore Sudo knows
18 that Andrew Watters' interests are adverse to those of 6x7. Sudo has issued a subpoena to 6x7's
19 former legal counsel contrary to the general reluctance of California courts to allow depositions of
20 opposing counsel. Additionally, this category of records sought by the subpoena is overbroad and
21 encompasses irrelevant, privileged, non-discoverable information. The documents sought include
22 documents containing trade secrets. (Evid. Code § 1060.) The documents sought encompass
23 confidential and/or attorney-client privileged information. (Evid. Code § 954; B&P Code § 6068,
24 subd. (e)(1).) The Discovery Act explicitly restricts this type of discovery.

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1 **SUDO’S REQUEST:**

2 4. All documents relating to Benjamin Cannon’s and/or 6x7 Networks LLC’s
3 purchase of electronic equipment from April to August 2019.

4 **6x7’S RESPONSE:**

5 6x7, a data services provider, has sued Sudo for breach of contract and related claims
6 based on Sudo’s failure to pay for agreed-upon data services. Sudo cross-complained alleging
7 fraud-related claims regarding the formation of the parties’ agreement(s) and whether 6x7 was
8 capable of providing the agreed-upon services.

9 The subject of the subpoena at issue, Andrew Watters, is former general counsel for 6x7.
10 Sudo, which 6x7’s opponent in this litigation, has subpoenaed records from 6x7’s former attorney
11 with knowledge that Andrew Watters has initiated his own civil action now pending against 6x7
12 based on claims similar to those raised in the above-captioned action, and therefore Sudo knows
13 that Andrew Watters’ interests are adverse to those of 6x7. Sudo has issued a subpoena to 6x7’s
14 former legal counsel contrary to the general reluctance of California courts to allow depositions of
15 opposing counsel. Additionally, this category of records sought by the subpoena is overbroad and
16 encompasses irrelevant, privileged, non-discoverable information. The documents sought include
17 documents containing trade secrets. (Evid. Code § 1060.) The documents sought encompass
18 confidential and/or attorney-client privileged information. (Evid. Code § 954; B&P Code § 6068,
19 subd. (e)(1).) The Discovery Act explicitly restricts this type of discovery.

20 **SUDO’S REQUEST:**

21 5. All documents reflecting contract counterparties and/or potential clients of 6x7
22 Networks LLC from January 2019 to present.

23 **6x7’S RESPONSE:**

24 6x7, a data services provider, has sued Sudo for breach of contract and related claims
25 based on Sudo’s failure to pay for agreed-upon data services. Sudo cross-complained alleging
26 fraud-related claims regarding the formation of the parties’ agreement(s) and whether 6x7 was
27 capable of providing the agreed-upon services.

28 The subject of the subpoena at issue, Andrew Watters, is former general counsel for 6x7.

1 Sudo, which 6x7's opponent in this litigation, has subpoenaed records from 6x7's former attorney
2 with knowledge that Andrew Watters has initiated his own civil action now pending against 6x7
3 based on claims similar to those raised in the above-captioned action, and therefore Sudo knows
4 that Andrew Watters' interests are adverse to those of 6x7. Sudo has issued a subpoena to 6x7's
5 former legal counsel contrary to the general reluctance of California courts to allow depositions of
6 opposing counsel. Additionally, this category of records sought by the subpoena is overbroad and
7 encompasses irrelevant, privileged, non-discoverable information. The documents sought include
8 documents containing trade secrets. (Evid. Code § 1060.) The documents sought encompass
9 confidential and/or attorney-client privileged information. (Evid. Code § 954; B&P Code § 6068,
10 subd. (e)(1).) The Discovery Act explicitly restricts this type of discovery.

11 **SUDO'S REQUEST:**

12 6. Any list of names of employees of 6x7 Networks LLC.

13 **6x7'S RESPONSE:**

14 6x7, a data services provider, has sued Sudo for breach of contract and related claims
15 based on Sudo's failure to pay for agreed-upon data services. Sudo cross-complained alleging
16 fraud-related claims regarding the formation of the parties' agreement(s) and whether 6x7 was
17 capable of providing the agreed-upon services.

18 The subject of the subpoena at issue, Andrew Watters, is former general counsel for 6x7.
19 Sudo, which 6x7's opponent in this litigation, has subpoenaed records from 6x7's former attorney
20 with knowledge that Andrew Watters has initiated his own civil action now pending against 6x7
21 based on claims similar to those raised in the above-captioned action, and therefore Sudo knows
22 that Andrew Watters' interests are adverse to those of 6x7. Sudo has issued a subpoena to 6x7's
23 former legal counsel contrary to the general reluctance of California courts to allow depositions of
24 opposing counsel. Additionally, this category of records sought by the subpoena is overbroad and
25 encompasses irrelevant, privileged, non-discoverable information. The documents sought include
26 documents containing trade secrets. (Evid. Code § 1060.) The documents sought encompass
27 confidential and/or attorney-client privileged information. (Evid. Code § 954; B&P Code § 6068,
28 subd. (e)(1).) The Discovery Act explicitly restricts this type of discovery.

1 **SUDO’S REQUEST:**

2 7. All documents relating to the presence of security personnel at 6x7 Networks
3 LLC’s location(s) from March 1, 2019 to October 31, 2019 (not including employee personnel
4 files).

5 **6x7’S RESPONSE:**

6 6x7, a data services provider, has sued Sudo for breach of contract and related claims
7 based on Sudo’s failure to pay for agreed-upon data services. Sudo cross-complained alleging
8 fraud-related claims regarding the formation of the parties’ agreement(s) and whether 6x7 was
9 capable of providing the agreed-upon services.

10 The subject of the subpoena at issue, Andrew Watters, is former general counsel for 6x7.
11 Sudo, which 6x7’s opponent in this litigation, has subpoenaed records from 6x7’s former attorney
12 with knowledge that Andrew Watters has initiated his own civil action now pending against 6x7
13 based on claims similar to those raised in the above-captioned action, and therefore Sudo knows
14 that Andrew Watters’ interests are adverse to those of 6x7. Sudo has issued a subpoena to 6x7’s
15 former legal counsel contrary to the general reluctance of California courts to allow depositions of
16 opposing counsel. Additionally, this category of records sought by the subpoena is overbroad and
17 encompasses irrelevant, privileged, non-discoverable information. The documents sought include
18 documents containing trade secrets. (Evid. Code § 1060.) The documents sought encompass
19 confidential and/or attorney-client privileged information. (Evid. Code § 954; B&P Code § 6068,
20 subd. (e)(1).) The Discovery Act explicitly restricts this type of discovery.

21 **SUDO’S REQUEST:**

22 8. All documents relating to the creation and/or content of 6x7 Networks LLC’s
23 website from January 2019 to present.

24 **6x7’S RESPONSE:**

25 6x7, a data services provider, has sued Sudo for breach of contract and related claims
26 based on Sudo’s failure to pay for agreed-upon data services. Sudo cross-complained alleging
27 fraud-related claims regarding the formation of the parties’ agreement(s) and whether 6x7 was
28 capable of providing the agreed-upon services.

1 The subject of the subpoena at issue, Andrew Watters, is former general counsel for 6x7.
2 Sudo, which 6x7's opponent in this litigation, has subpoenaed records from 6x7's former attorney
3 with knowledge that Andrew Watters has initiated his own civil action now pending against 6x7
4 based on claims similar to those raised in the above-captioned action, and therefore Sudo knows
5 that Andrew Watters' interests are adverse to those of 6x7. Sudo has issued a subpoena to 6x7's
6 former legal counsel contrary to the general reluctance of California courts to allow depositions of
7 opposing counsel. Additionally, this category of records sought by the subpoena is overbroad and
8 encompasses irrelevant, privileged, non-discoverable information. The documents sought include
9 documents containing trade secrets. (Evid. Code § 1060.) The documents sought encompass
10 confidential and/or attorney-client privileged information. (Evid. Code § 954; B&P Code § 6068,
11 subd. (e)(1).) The Discovery Act explicitly restricts this type of discovery.

12 **SUDO'S REQUEST:**

13 9. All documents relating to the unlawful detainer lawsuit filed against 6x7 Networks
14 LLC in or about 2019.

15 **6x7'S RESPONSE:**

16 6x7, a data services provider, has sued Sudo for breach of contract and related claims
17 based on Sudo's failure to pay for agreed-upon data services. Sudo cross-complained alleging
18 fraud-related claims regarding the formation of the parties' agreement(s) and whether 6x7 was
19 capable of providing the agreed-upon services.

20 The subject of the subpoena at issue, Andrew Watters, is former general counsel for 6x7.
21 Sudo, which 6x7's opponent in this litigation, has subpoenaed records from 6x7's former attorney
22 with knowledge that Andrew Watters has initiated his own civil action now pending against 6x7
23 based on claims similar to those raised in the above-captioned action, and therefore Sudo knows
24 that Andrew Watters' interests are adverse to those of 6x7. Sudo has issued a subpoena to 6x7's
25 former legal counsel contrary to the general reluctance of California courts to allow depositions of
26 opposing counsel. Additionally, this category of records sought by the subpoena is overbroad and
27 encompasses irrelevant, privileged, non-discoverable information. The documents sought include
28 documents containing trade secrets. (Evid. Code § 1060.) The documents sought encompass

1 confidential and/or attorney-client privileged information. (Evid. Code § 954; B&P Code § 6068,
2 subd. (e)(1).) The Discovery Act explicitly restricts this type of discovery.

3 **SUDO'S REQUEST:**

4 10. All documents relating to Sudo Security Group and/or Guardian, Steven Russell,
5 and/or Sean Snyder.

6 **6x7'S RESPONSE:**

7 6x7, a data services provider, has sued Sudo for breach of contract and related claims
8 based on Sudo's failure to pay for agreed-upon data services. Sudo cross-complained alleging
9 fraud-related claims regarding the formation of the parties' agreement(s) and whether 6x7 was
10 capable of providing the agreed-upon services.

11 The subject of the subpoena at issue, Andrew Watters, is former general counsel for 6x7.
12 Sudo, which 6x7's opponent in this litigation, has subpoenaed records from 6x7's former attorney
13 with knowledge that Andrew Watters has initiated his own civil action now pending against 6x7
14 based on claims similar to those raised in the above-captioned action, and therefore Sudo knows
15 that Andrew Watters' interests are adverse to those of 6x7. Sudo has issued a subpoena to 6x7's
16 former legal counsel contrary to the general reluctance of California courts to allow depositions of
17 opposing counsel. Additionally, this category of records sought by the subpoena is overbroad and
18 encompasses irrelevant, privileged, non-discoverable information. The documents sought include
19 documents containing trade secrets. (Evid. Code § 1060.) The documents sought encompass
20 confidential and/or attorney-client privileged information. (Evid. Code § 954; B&P Code § 6068,
21 subd. (e)(1).) The Discovery Act explicitly restricts this type of discovery.

22 **SUDO'S REQUEST:**

23 11. All documents reflecting or relating to statements by Benjamin Cannon and/or 6x7
24 Networks LLC to existing and/or prospective customers (including you) regarding 6x7 Networks
25 LLC's data center operations, including, without limitation, copies of sales packets distributed to
26 prospective customers and email correspondence between 6x7 Networks LLC's employees and
27 prospective customers.

28

1 **6x7'S RESPONSE:**

2 6x7, a data services provider, has sued Sudo for breach of contract and related claims
3 based on Sudo's failure to pay for agreed-upon data services. Sudo cross-complained alleging
4 fraud-related claims regarding the formation of the parties' agreement(s) and whether 6x7 was
5 capable of providing the agreed-upon services.

6 The subject of the subpoena at issue, Andrew Watters, is former general counsel for 6x7.
7 Sudo, which 6x7's opponent in this litigation, has subpoenaed records from 6x7's former attorney
8 with knowledge that Andrew Watters has initiated his own civil action now pending against 6x7
9 based on claims similar to those raised in the above-captioned action, and therefore Sudo knows
10 that Andrew Watters' interests are adverse to those of 6x7. Sudo has issued a subpoena to 6x7's
11 former legal counsel contrary to the general reluctance of California courts to allow depositions of
12 opposing counsel. Additionally, this category of records sought by the subpoena is overbroad and
13 encompasses irrelevant, privileged, non-discoverable information. The documents sought include
14 documents containing trade secrets. (Evid. Code § 1060.) The documents sought encompass
15 confidential and/or attorney-client privileged information. (Evid. Code § 954; B&P Code § 6068,
16 subd. (e)(1).) The Discovery Act explicitly restricts this type of discovery.

17 **SUDO'S REQUEST:**

18 12. All photographs of 6x7 Networks LLC's datacenter location(s).

19 **6x7'S RESPONSE:**

20 6x7, a data services provider, has sued Sudo for breach of contract and related claims
21 based on Sudo's failure to pay for agreed-upon data services. Sudo cross-complained alleging
22 fraud-related claims regarding the formation of the parties' agreement(s) and whether 6x7 was
23 capable of providing the agreed-upon services.

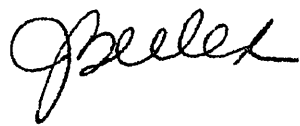
24 The subject of the subpoena at issue, Andrew Watters, is former general counsel for 6x7.
25 Sudo, which 6x7's opponent in this litigation, has subpoenaed records from 6x7's former attorney
26 with knowledge that Andrew Watters has initiated his own civil action now pending against 6x7
27 based on claims similar to those raised in the above-captioned action, and therefore Sudo knows
28 that Andrew Watters' interests are adverse to those of 6x7. Sudo has issued a subpoena to 6x7's

1 former legal counsel contrary to the general reluctance of California courts to allow depositions of
2 opposing counsel. Additionally, this category of records sought by the subpoena is overbroad and
3 encompasses irrelevant, privileged, non-discoverable information. The documents sought include
4 documents containing trade secrets. (Evid. Code § 1060.) The documents sought encompass
5 confidential and/or attorney-client privileged information. (Evid. Code § 954; B&P Code § 6068,
6 subd. (e)(1).) The Discovery Act explicitly restricts this type of discovery.

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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 SAN FRANCISCO

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 SEPARATE STATEMENT IN SUPPORT OF 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.

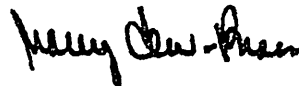
43 Placed the envelope or package for collection and mailing, following our ordinary
44 business practices. I am readily familiar with the firm's practice for collection and processing
45 correspondence for mailing. Under that practice, on the same day that correspondence is placed
46 for collection 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.

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

7 (BY E-MAIL OR ELECTRONIC TRANSMISSION) Based on a court order or an
8 agreement of the parties to accept service by e-mail or electronic transmission, I caused the
9 documents to be sent from e-mail address Nancy.Lew-Pham@lewisbrisbois.com to the
10 persons at the e-mail addresses listed above. I did not receive, within a reasonable time
11 after the transmission, any electronic message or other indication that the transmission was
12 unsuccessful.

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

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

16 

17 _____
18 Nancy Lew-Pham