1 2 3 4	LEWIS BRISBOIS BISGAARD & SMITH LI BRIAN SLOME, SB# 238134 E-Mail: Brian.Slome@lewisbrisbois.com 550 West C Street, Suite 1700 San Diego, California 92101 Telephone: 619.233.1006 Facsimile: 619.233.8627	.P
5 6 7 8 9	LEWIS BRISBOIS BISGAARD & SMITH LI JESSICA L. BEELER, SB# 268939 E-Mail: Jessica.Beeler@lewisbrisbois.com 333 Bush Street, Suite 1100 San Francisco, California 94104-2872 Telephone: 415.362.2580 Facsimile: 415.434.0882 Attorneys for Cross-Defendants 6x7 Networks, LLC and Benjamin Cannon	,P
11	SUPERIOR COURT OF TH	E STATE OF CALIFORNIA
12	COUNTY OF S.	AN FRANCISCO
13		
14 15 16 17 18 19 20 21 22 23 24 225 26 27 28	6x7 NETWORKS, LLC, a Delaware limited liability company, Plaintiff, vs. SUDO SECURITY GROUP, INC., a Delaware corporation doing business as Guardian; STEVE RUSSELL, an individual; SEAN SNYDER, an individual, and DOES 1 through 100, inclusive, Defendants. SUDO SECURITY GROUP, INC., a Delaware corporation, Cross-Complainant, vs. 6x7 NETWORKS, LLC, a Delaware limited liability company, and BENJAMIN CANNON, an individual, Cross-Defendants.	SUPPLEMENTAL DECLARATION OF JESSICA L. BEELER 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 a.m. Dept.:301 Action Filed: December 13, 2019 Trial Date: None Set

testify thereto.

IS ⁴

4830-0862-6649.1

Abellex

Jessica L. Beeler

1. I am an attorney duly admitted to practice in all of the courts of the State of California and I am an associate with Lewis Brisbois Bisgaard & Smith LLP, attorneys of record for Plaintiff and Cross-Defendants 6x7 Networks, LLC and Benjamin Cannon herein. The facts set forth herein are of my own personal knowledge, and if sworn I could and would competently

SUPPLEMENTAL DECLARATION OF JESSICA L. BEELER

I, Jessica L. Beeler, declare as follows:

2. On January 25, 2021, I caused to be filed a notice of motion, memorandum of points and authorities, a proposed order, and two declarations in support of Plaintiff and Cross-Defendants 6x7 Networks, LLC and Benjamin Cannon's ("6x7") 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 (the "Motion"). Our office did not file a Separate Statement in support of the Motion on January 25, 2021.

3. Since the Motion seeks an order quashing the entire subpoena in addition to requesting possible alternative relief in the form of a protective order, a Separate Statement may be required under California Rules of Court Rule 3.1345. Accordingly, on today's date our office will file a Separate Statement out of an abundance of caution. This separate statement is filed more than 16 court days from the hearing on 6x7's motion.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that this declaration was executed on this 27th day of January, 2021, at San Francisco, California.

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 SAN FRANCISCO

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

SUPPLEMENTAL DECLARATION OF JESSICA L. BEELER IN SUPPORT OF MOTION TO QUASH DEPOSITION SUBPOENA OF SUDO SECURITY GROUP, INC. TO ANDREW WATTERS AND/OR FOR A PROTECTIVE ORDER

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

10	Attorneys for Plaintiff, 6x7 Networks, LLC	Attorneys for Defendant/Cross- Complainant Sudo Security Group
11	Marc A. Indeglia Indeglia PC	Richard D. Lutkus
12	13274 Fiji Way, Suite 250 Marina del Rey, California 90292	M. Ryan Pinkston Seyfarth Shaw LLP
13	Tel.: (310) 982-2720	560 Mission Street, 31st Floor
14	Email: marc@indegliapc.com	San Francisco, California 94105 Tel.: (415) 397-2823
15		Fax: (415) 397-8549 Email: <u>rlutkus@seyfarth.com</u>
16		Email: rpinkston@seyfarth.com
17	Andrew G. Watters 118 South Blvd.	Nationwide Legal LLC 859 Harrison Street Suite A
18	San Mateo, CA 94402	San Francisco, CA 94107
19	Via U.S. Mail	Via U.S. Mail

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 (TO ANDREW G. WATTERS and NATIONWIDE LEGAL only) 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.

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& SIVITH LLP

1	(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	
2	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	
3	Receipt Page/Confirmation will be filed, deposited, or maintained with the original document in this office.	
4	(BY E-MAIL OR ELECTRONIC TRANSMISSION) Based on a court order or an	
5	(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	
6	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	
7	unsuccessful.	
8	I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.	
9	Executed on January 27, 2021, at San Francisco, California.	
10	Executed on January 27, 2021, at Bail I faileised, Camolina.	
11		
12	Nancy Lew-Pham	
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LEWIS BRISBOIS BISGAARD & SMITH LLP ATTORNEYS AT LAW