

JOSHUA A. BASKIN, State Bar No. 294971
THOMAS R. WAKEFIELD, State Bar No. 330121
WILSON SONSINI GOODRICH & ROSATI
Professional Corporation
One Market Plaza
Spear Tower, Suite 3300
San Francisco, CA 94105-1126
Telephone: (415) 947-2000
Facsimile: (866) 974-7329
Email: jbaskin@wsgr.com
Email: twakefield@wsgr.com

Attorneys for Defendant
SUBSTACK, INC.

ELECTRONICALLY
FILED
Superior Court of California,
County of San Francisco
12/06/2024
Clerk of the Court
BY: SANDRA SCHIRO
Deputy Clerk

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SAN FRANCISCO

JOHN DOE, an individual,

Plaintiff,

v.

SUBSTACK, INC., a Delaware corporation;
AMAZON WEB SERVICES, INC., a
Delaware corporation; JACK POULSON, an
individual; TECH INQUIRY, INC., a
Delaware corporation; DOES 1-25, inclusive,

Defendants.

CASE NO.: CGC-24-618681

**DEFENDANT'S MOTION TO
FILE PORTIONS OF SPECIAL
MOTION TO STRIKE PLAINTIFF'S
COMPLAINT AND DEFENDANT'S
DEMURRER UNDER SEAL**

Date: January 6, 2025
Time: 9:30a.m.
Dept: 302
Before: Hon. Richard B. Ulmer, Jr.

Action Filed: October 3, 2024
Trial Date: None Set

1 **TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

2 PLEASE TAKE NOTICE that on January 6, 2024 at 9:30a.m. at Department 302 Defendant
3 will and hereby does move the Court pursuant to California Rules of Court 2.550 and 2.551 to issue
4 an order sealing the Declaration of Joshua A. Baskin in support of Defendant's Special Motion to
5 Strike and Defendant's Demurrer to Complaint ("Declaration") and the exhibits filed therewith
6 ("Exhibits"), which have been lodged conditionally under seal.

7 Defendant files this Motion out of an abundance of caution. Defendant does not believe any
8 of the materials should be sealed. However, Plaintiff might believe that good cause exists for
9 granting this Motion to Seal. (See Declaration of Joshua A. Baskin, filed herewith.)

10 This Motion is based on the accompanying Memorandum of Points and Authorities, the
11 Declaration, the papers and records on file in this action, and such further evidence or argument as
12 may be submitted at or before the time of the hearing.

13
14 Dated: December 6, 2024

WILSON SONSINI GOODRICH & ROSATI
Professional Corporation

15 By: /s/ Joshua A. Baskin
16 Joshua A. Baskin
17 E-mail: jlbaskin@wsgr.com

18 Attorneys for Defendant
19 Substack, Inc.
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WILSON SONSINI GOODRICH & ROSATI
Professional Corporation

By: /s/ Joshua A. Baskin
Joshua A. Baskin

Attorneys for Defendant
Substack, Inc.