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14 Attorneys for Defendant
15 AMAZON WEB SERVICES, INC.

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17 IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA
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19 IN AND FOR THE COUNTY OF SAN FRANCISCO
20
21 UNLIMITED JURISDICTION
22

23 MAURY BLACKMAN, an individual,

24 Plaintiff,

25 v.

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

Defendants.

Case No. CGC-24-618681

**AMAZON WEB SERVICES, INC.'S
AMENDED MOTION TO FILE
PORTIONS OF REPLY IN SUPPORT OF
SPECIAL MOTION TO STRIKE
PLAINTIFF'S COMPLAINT AND
EVIDENTIARY OBJECTIONS
PROVISIONALLY UNDER SEAL**

Date: March 3, 2025
Time: 9:00 a.m.
Dept.: 301

Action Filed: October 3, 2024

ELECTRONICALLY
FILED
Superior Court of California,
County of San Francisco

02/05/2025
Clerk of the Court
BY: SANDRA SCHIRO
Deputy Clerk

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

2 PLEASE TAKE NOTICE that on March 3, 2025, in Department 301 of the Superior Court
3 for the County of San Francisco, located at 400 McAllister Street, San Francisco, California, at
4 9:00 a.m. or as soon thereafter as counsel may be heard, defendant Amazon Web Services, Inc.
5 (“AWS”) will and hereby does move the Court for an order sealing its concurrently-filed (1)
6 Reply in Support of Special Motion to Strike Plaintiff’s Complaint Pursuant to California Code of
7 Civil Procedure Section 425.16 and (2) Objections to Plaintiff’s Evidence Submitted in Support of
8 his Opposition to Special Motion to Strike, which have been lodged provisionally under seal.

9 Pursuant to the Court’s directive at the February 4, 2025 hearing on the SLAPP Motion
10 and the Court’s January 7, 2025 order, AWS files this Motion to seal only that information from
11 the Reply that is not already public. See Declaration of Sarah E. Burns (“Burns Declaration”) ¶¶
12 3-5.

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

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17 DATED: February 5, 2025

18 DAVIS WRIGHT TREMAINE LLP
19 SARAH E. BURNS
20 SAMUEL A. TURNER

21 By: /s/ Sarah E. Burns
22 Sarah E. Burns

23 Attorneys for Defendant
24 AMAZON WEB SERVICES, INC.
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MEMORANDUM OF POINTS AND AUTHORITIES

I. INTRODUCTION

On January 28, 2025, defendant Amazon Web Services, Inc. (“AWS”) filed its Reply in Support of Special Motion to Strike Plaintiff’s Complaint Pursuant to California Code of Civil Procedure Section 425.16 (“Reply”) and its Objections to Plaintiff’s Evidence Submitted in Support of his Opposition to Special Motion to Strike (“Evidentiary Objections”). When AWS did so, it took what it believed to be the most conservative approach: it filed both documents provisionally under seal, sealing all of the information Plaintiff had sealed in his Opposition. Plaintiff opposed the motion. At the February 4, 2025 hearing on the SLAPP Motion, the Court instructed AWS to file a new version of the Reply and Objections sealing only information that was not already public. AWS does so now.

II. ARGUMENT

The Court may seal a record if it finds facts showing “(1) [t]here exists an overriding interest that overcomes the right of public access to the record; (2) [t]he overriding interest supports sealing the record; (3) [a] substantial probability exists that the overriding interest will be prejudiced if the record is not sealed; (4) [t]he proposed sealing is narrowly tailored; and (5) [n]o less restrictive means exist to achieve the overriding interest.” Cal. R. Ct. 2.550(d).

Pursuant to the Court’s directive at the February 4, 2025 hearing, AWS by this Motion seeks only to seal information Plaintiff has not included in public filings. Thus, AWS has redacted details from the Incident Report that Plaintiff has not included in public filings, as well as statements from Plaintiff’s Declaration in support of his Opposition to AWS’s SLAPP Motion, which are quoted in the Objections.

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Dated: February 5, 2025

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SARAH E. BURNS
SAMUEL A. TURNER

By: /s/ Sarah E. Burns
Sarah E. Burns

Attorneys for Defendant
AMAZON WEB SERVICES, INC.