

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS**

SNEAKER MATCH, LLC,  
an Arizona Limited Liability Company,

Plaintiff,

Case No.: 21-cv-05927

v.

JOHN DOES 1-10,

Defendants.

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**PLAINTIFF’S MOTION FOR LEAVE TO FILE UNDER  
SEAL**

Plaintiff Sneaker Match LLC (“Plaintiff”) files this Motion requesting leave to file the following documents under seal:

(1) Exhibit 4 to the Complaint referred to as “Schedule A” which will identify Defendants’ currently known aliases and list the domain names of the fully interactive, e-commerce stores operating under the Defendants’ aliases (filed at ECF 1-4 (redacted) and ECF 2 (under seal)); and,

(2) Exhibits 3, 4, and 6 to the Rodriguez Declaration in support of Plaintiff’s Motion for Entry of a Temporary Restraining Order, including a Temporary Asset Restraint, Expedited Discovery, and Electronic Service (the “Motion”) (to be filed), which includes specific references to the infringing online storefronts.

Plaintiff additionally requests, in the event this Court grants the Motion, to have the resulting order sealed.

In this action, Plaintiff is requesting temporary *ex parte* relief based on an action for trademark infringement, counterfeiting, false designation of origin, and copyright infringement. Sealing this portion of the file is necessary to prevent the Defendants from learning of these

proceedings prior to the execution of the temporary restraining order. If Defendants were to learn of these proceedings prematurely, the likely result would be the destruction of relevant documentary evidence and the hiding or transferring of ill-gotten assets to foreign jurisdictions, which would frustrate the purpose of the underlying law and would interfere with this Court's power to grant relief. Once the temporary restraining order has been served on the relevant parties and the requested actions are taken, Plaintiff will move to unseal these documents.

Date: November 10, 2021

Sneaker Match, LLC

/s/ Eric Misterovich  
Eric Misterovich  
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### **CERTIFICATE OF SERVICE**

The undersigned certifies that on the date below, the foregoing Motion for Leave to File Under Seal was served on counsel of record via the Court's ECF system.

Date: November 10, 2021

Sneaker Match, LLC

/s/ Eric Misterovich  
Eric Misterovich  
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