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13 *Counsel for Individual and Representative*
14 *Plaintiffs and the Proposed Class*

15 **UNITED STATES DISTRICT COURT**
16 **NORTHERN DISTRICT OF CALIFORNIA**
17 **OAKLAND DIVISION**

18 J. DOE 1, et al.,
19 Individual and Representative Plaintiffs,
20 v.
21 GITHUB, INC., et al.,
22 Defendants.

Case Nos. 4:22-cv-06823-JST
4:22-cv-07074-JST

**DECLARATION OF TRAVIS
MANFREDI IN SUPPORT OF
PLAINTIFFS' ADMINISTRATIVE
MOTION TO FILE UNDER SEAL
PORTIONS OF FIRST AMENDED
COMPLAINT**

1 I, Travis Manfredi, declare as follows:

2 1. I am an attorney duly licensed to practice in the State of California. I am an associate at
3 the Joseph Saveri Law Firm, LLP, counsel of record for Plaintiffs Does 1–5 in this action. I have personal
4 knowledge of the matters stated herein and, if called upon, I could competently testify thereto. I make
5 this declaration pursuant to 28 U.S.C. Section 1746 and Local Rule 79-5(c) in support of Plaintiffs’
6 Administrative Motion to File Under Seal Portions of First Amended Complaint (“Sealing Motion”).

7 2. Plaintiffs have reviewed and complied with the Standing Order Governing Administrative
8 Motions to File Materials Under Seal Before District Judge Jon S. Tigar.

9 3. Plaintiffs have reviewed and complied with Civil Local Rule 79-5. Plaintiffs’ redactions are
10 narrowly tailored to seal only sealable material.

11 4. The following chart sets forth detail regarding the information Plaintiffs seek to file under
12 seal:

FAC Paragraph(s) #	Description of Information	Reason for Sealing
19–23	Each paragraph contains one Plaintiff’s name	The Court has already determined it is appropriate for Plaintiffs to proceed pseudonymously at this stage due to Plaintiffs’ reasonable fear that credible threats of physical violence may be carried out. <i>See Doe 1, 2023 WL 3449131, at *7-9.</i>
101–103	Examples and descriptions of code Doe 2 made available to the public on GitHub.	To protect Doe 2 from credible threats of physical violence. Doe 2 could easily be identified by searching for this code on GitHub and other public repositories.
106–109 & 111	Examples and descriptions of code Doe 1 made available to the public on GitHub.	To protect Doe 1 from credible threats of physical violence. Doe 1 could easily be identified by searching for this code on GitHub and other public repositories.

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1 I declare under penalty of perjury that the foregoing is true and correct. Executed this 8th day of
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5 June 2023 at San Francisco, California.

6 */s/ Joseph R. Saveri*
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Travis Manfredi

SIGNATURE ATTESTATION

I hereby attest that I have on file all holographic signatures corresponding to any signatures indicated by a conformed signature (/s/) within this e-filed document.

I declare under penalty of perjury that the foregoing is true and correct. Executed on June 8, 2023 in San Francisco, California.

/s/ Joseph R. Saveri
Joseph R. Saveri