

UNITED STATES DISTRICT COURT
DISTRICT OF DELAWARE

DISPLAY TECHNOLOGIES, LLC,

Plaintiff,

v.

ASTON MARTIN, LLC,

Defendant.

CASE NO. 1:20-cv-00258-RGA

APPLICATION TO FILE UNDER SEAL

Plaintiff, Display Technologies, LLC (“Plaintiff” and/or “Display”), by and through its undersigned counsel and in response to the Court’s May 17, 2021, Oral Order [Doc. 18] hereby files this its Application to File Under Seal. Plaintiff applies for an order permitting Plaintiff to file under seal the following Settlement and License Agreements (hereinafter collectively referred to as “Agreements”):

1) Settlement and License Agreement for Case No. 1:20-cv-00261-RGA; *Display Technologies, LLC v. Jaguar Land Rover North America, LLC*, and accompanied cover letter setting forth the dollar amount of the settlement.

2) Settlement and License Agreement for Case No. 1:18-cv-01390-RGA; *Display Technologies, LLC v. Como Audio, LLC*, and accompanied cover letter setting forth the dollar amount of the settlement.

3) Settlement and License Agreement for Case No. 1:17-cv-01427-RGA; *Display Technologies, LLC v. Pioneer & Onkyo Corporation U.S.A. Corporation*, and accompanied cover letter setting forth the dollar amount of the settlement.

REASONS SUPPORTING RELIEF REQUESTED

Good cause exists to seal these Settlement and License Agreements. The Agreements contain confidentiality clauses such that if the documents were not filed under seal, Plaintiff might be in breach of the confidentiality clauses agreed to by the respective Parties.

CONCLUSION

For the foregoing reason, Display Technologies, LLC respectfully requests that the Court order the Agreements filed under seal.

DATED: June 15, 2021

Respectfully Submitted,

CHONG LAW FIRM PA

/s/ Jimmy Chong

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ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

The undersigned certifies that all counsel of record for Defendant are being served with a copy of this document via e-filing, on June 15, 2021.

/s/ Jimmy Chong

Jimmy Chong (#4839)