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UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

Federal Trade Commission,

Plaintiff,

vs.

OTA Franchise Corporation, et al.

Defendants.

Case No. 20-cv-00287-JVS-KES

APPLICATION TO SEAL DECLARATIONS OF ERIC LUEDERS AND TIMOTHY P. JOHNSON IN SUPPORT OF APPLICATION TO SEAL PORTIONS OF PLAINTIFF'S EX PARTE APPLICATION FOR TEMPORARY RESTRAINING ORDER AND DECLARATION OF CONNOR GEIRAN

APPLICATION TO SEAL

Pursuant to Civil Local Rule 79-5.1, Applicant Universal Guardian Acceptance

BARRON & NEWBURGER, P.C.

LLC (UGA) submits this Application to seal the following:

1. The Declaration of Eric Lueders in Support of UGA's Application to Seal Portions of Plaintiff's Ex Parte Application for Temporary Restraining Order and Declaration of Connor Geiran.

2. The Declaration of Timothy P. Johnson in Support of UGA's Application to Seal Portions of Plaintiff's Ex Parte Application for Temporary Restraining Order and Declaration of Connor Geiran.

These Declarations are necessary to support UGA's Application to Seal Portions of Plaintiff's Ex Parte Application for Temporary Restraining Order and Declaration of Connor Geiran. These Declarations contain confidential material regarding UGA business operations.

Compelling reasons exist to seal the confidential portions of these documents. Disclosure of the confidential information described above would be economically harmful to UGA as described in the Declaration of Eric Lueders which, as a third party to this litigation, produced its confidential and proprietary information to Plaintiff prior to the filing of this litigation in response to a Civil Investigative Demand issued to it by Plaintiff. Accordingly, UGA respectfully requests that the above described Declarations filed in support of UGA's application to seal portions of Plaintiff's pleadings filed in this action be sealed.

Dated: February 18, 2020

BARRON & NEWBURGER, P.C.

By: /s/Timothy Johnson
TIMOTHY P. JOHNSON
Attorneys for Applicant
Universal Guardian Acceptance LLC

BARRON & NEWBURGER, P.C.

CERTIFICATE OF SERVICE

I, Timothy P. Johnson, do hereby certify that the Application to Seal Declaration in Support of Application to Seal Portions of Plaintiff's Ex Parte Application for Temporary Restraining Order and Declaration of Connor Guerin was served this 18th day of February, 2020, on all counsel of record via the Court's ECF system.

_/s/Timothy Johnson_____
TIMOTHY P. JOHNSON