

**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF WISCONSIN
MILWAUKEE DIVISION**

ANDREW L. COLBORN,

Plaintiff,

vs.

**NETFLIX, INC.; CHROME MEDIA LLC,
F/K/A SYNTHESIS FILMS, LLC;
LAURA RICCIARDI; AND MOIRA
DEMOS,**

Defendants.

Civil No.: 19-CV-484-BHL

**DEFENDANTS LAURA RICCIARDI, MOIRA DEMOS, AND CHROME MEDIA LLC'S
RESPONSE TO PLAINTIFF'S EMERGENCY EXPEDITED RULE 7(H)
MOTION TO TEMPORARILY RESTRICT, DKT. 332**

The Producer Defendants—Laura Ricciardi, Moira Demos, and Chrome Media LLC—respectfully submit this response to Plaintiff’s Emergency Expedited Rule 7(H) Motion to Temporarily Restrict (Dkt. 332). Having now had the opportunity to review the materials in question, the Producer Defendants do not seek continued restriction or redaction of Plaintiff’s Additional Proposed Findings of Fact at Dkt. 325 or Redacted Opposition Brief at Dkt. 331. The Producer Defendants agree these documents should be made fully available on the public docket.

The Producer Defendants will respond separately to Plaintiff’s November 3, 2022 Motion to Restrict (Dkt. 305) and November 4, 2022 Motion to Restrict (Dkt. 322). The Producer Defendants’ responses to those Motions are due on or before November 24 and 25 respectively, per Local Rule 7(b).

///

Dated: November 14, 2022

Respectfully submitted,

s/ Kevin L. Vick

Kevin L. Vick (*pro hac vice*)

Meghan Fenzel (*pro hac vice*)

JASSY VICK CAROLAN LLP

355 South Grand Avenue, Suite 2450

Los Angeles, CA 90071

T: (310) 870-7048

F: (310) 870-7010

kvick@jassyvick.com

mfenzel@jassyvick.com

Counsel for Defendant Laura Ricciardi, Moira

Demos, and Chrome Media, LLC

James A. Friedman, SBN 1020756

GODFREY & KAHN, S.C.

One East Main Street

Suite 500

Madison, WI 53703-3300

T: (608) 284-2617

F: (608) 257-0609

jfriedman@gklaw.com

Counsel for the Defendants