

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN

ANDREW L. COLBORN,
Plaintiff

v.

NETFLIX, INC., et al.,
Defendants.

Case No. 19-CV-484

DECLARATION OF APRIL ROCKSTEAD BARKER

APRIL ROCKSTEAD BARKER, under penalty of perjury, deposes and says:

1. I am one of the attorneys of record for the Plaintiff in the above-captioned matter.
2. Attached as Exhibit 1 is a true and correct copy of an email message that I received from Attorney Leita Walker on or about the date shown thereon.
3. Attached as Exhibit 2 is a true and correct copy of an email message that I received from Attorney Leita Walker on or about the date shown thereon.

Dated this 22nd day of November, 2022.

/s/ April Rockstead Barker
April Rockstead Barker

From: Walker, Leita <WalkerL@ballardspahr.com>

Sent: Tuesday, August 2, 2022 9:28 AM

To: April Barker <abarker@sbe-law.com>; Kevin Vick <kvick@jassylvick.com>

Cc: Salomao Nascimento, Isabella <salomaonascimento@ballardspahr.com>; Parsons, Emmy <parsonse@ballardspahr.com>; Kelley, Matthew E. <KelleyM@ballardspahr.com>; Jean-Paul Jassy <jpjassy@jassylvick.com>; Meghan Fenzel <mfenzel@jassylvick.com>; James Friedman <JFriedman@gklaw.com>; George Burnett <GB@lcojlaw.com>; Debra L. Bursik <debrab@lcojlaw.com>

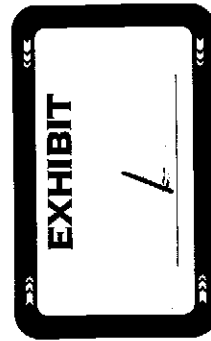
Subject: RE: Confidentiality Designations

Hi, April, circling back on this:

- We agree that you may file Netflix-produced notes and emails about or including notes conventionally, provided you redact email addresses and phone numbers.
- There are some discrete excerpts from the depositions of Del Deo and Nishimura for which we will maintain confidential/AEO designations, but otherwise we will agree to de-designate those transcripts. We will send you the discrete excerpts by separate email.
- We're happy to discuss the AEO-designated documents, but at this point I don't see us removing that designation or agreeing that those documents may be filed conventionally.
- For anything else you plan to file with the court, with some advance notice we're happy to consider de-designating so you can file conventionally.

Please let us know when you have a minute where you stand with regarding to Mr. Colborn's designations?

Leita



Walker, Leita <WalkerL@ballardspahr.com>

To: April Barker <aprilbarker@rocksteadlaw.com>, April Barker <abarker@sbe-law.com>

Cc: Kevin Vick <kvick@jassylvick.com>, Meghan Fenzel <mfenzel@jassylvick.com>, "Salomao Nascimento, Isabella" <salomaonascimento@ballardspahr.com>, Kelley, Matthew E." <KelleyM@ballardspahr.com>

Thu, Sep 15, 2022 at 11:30 AM

Counsel,

We are no longer planning to submit the entire license agreement to the court. If you plan to do so, it needs to be submitted under seal.

Leita

Leita Walker

Ballard Spahr
LLP

2000 IDS Center, 80 South 8th Street
Minneapolis, MN 55402-2119

612.371.6222 DIRECT
612.371.3207 FAX

walkerl@ballardspahr.com

www.ballardspahr.com

