

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
CASE NO. 23-61084-CIV-SMITH**

ADIDAS AG, *et al.*,

Plaintiffs,

vs.

THE INDIVIDUALS, BUSINESS ENTITIES,
AND UNINCORPORATED ASSOCIATIONS
IDENTIFIED ON SCHEDULE “A,”

Defendants.

PLAINTIFFS’ MOTION TO UNSEAL

Pursuant to Local Rule 5.4(b)(1), Plaintiffs, adidas AG, adidas International Marketing B.V., and adidas America, Inc., (collectively “Plaintiffs”), hereby move this Court for an Order unsealing all documents that have been restricted/sealed from the Court docket and returning all portions of the Court file to the public records.

1. On June 8, 2023, Plaintiffs filed their Motion to File Under Seal [ECF No. 5], requesting Schedule “A” to Plaintiffs’ Complaint be filed under seal. On June 13, 2023, the Court issued an Order granting Plaintiffs’ Motion to File Under Seal [DE 8], and Plaintiffs subsequently filed Schedule “A” to Plaintiffs’ Complaint [DE 9] under seal on June 13, 2023.

2. On June 9, 2023, Plaintiffs filed their *Ex Parte* Application for Entry of Temporary Restraining Order, Preliminary Injunction, and Order Restraining Transfer of Assets, together with the supporting Declarations and Exhibits (the “*Ex Parte* Application”) [DE 6], pursuant to Local Rule 5.4(d), which requires, unless the Court directs otherwise, *ex parte* filings be restricted from public view.

3. On June 22, 2023, this Court issued a Sealed Order Granting Plaintiffs’ *Ex Parte* Application (the “Sealed Temporary Restraining Order”) [DE 11]. Upon receipt, Plaintiffs

served the Sealed Temporary Restraining Order on the requisite financial institutions to restrain Defendants' financial accounts at issue.

4. Plaintiffs have subsequently served Defendants with the Sealed Temporary Restraining Order, together with all other documents filed in this case.

5. As a seal on this matter is no longer required, Plaintiffs respectfully request this matter be unsealed and the portions of the docket relating to Plaintiffs' *Ex Parte* Application, together with all other documents that have been restricted from the Court docket, be returned to the public portions of the Court file.

WHEREFORE, Plaintiffs respectfully request this Court issue an Order unsealing all documents filed with the Court that have been restricted from the Court docket and direct the Clerk to return those portions of the Court file to the public records.

DATED: July 5, 2023.

Respectfully submitted,

STEPHEN M. GAFFIGAN, P.A.

By: **Virgilio Gigante**

Stephen M. Gaffigan (Fla. Bar No. 025844)

Virgilio Gigante (Fla. Bar No. 082635)

T. Raquel Wiborg-Rodriguez (Fla. Bar No. 103372)

Christine Ann Daley (Fla. Bar No. 98482)

401 East Las Olas Blvd., Suite 130-453

Ft. Lauderdale, Florida 33301

Telephone: (954) 767-4819

E-mail: Stephen@smgpa.cloud

E-mail: Leo@smgpa.cloud

E-mail: Raquel@smgpa.cloud

E-mail: Christine@smgpa.cloud

Attorneys for Plaintiffs