

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION
Civil Action No. 5:21-cv-00251-BO

BERINGER COMMERCE, INC. d/b/a
BLUE ACORN iCi,

Plaintiff,

v.

FIN CAP, INC. d/b/a "BLUEACORN.CO,"
BLUE ACORN PPP, LLC, BLUE OAK
FOREST, LLC, MICHAEL S. COTA,
JIMMY FLORES, STEPHANIE
HOCKRIDGE REIS, and NATHAN REIS,

Defendants.

**PLAINTIFF'S MOTION FOR LEAVE TO
FILE UNDER TO SEAL**

NOW COMES Plaintiff BERINGER COMMERCE, INC. d/b/a BLUE ACORN iCi, by and through undersigned counsel, and pursuant to Local Civil Rule 79.2 and ECF Policy Manual Section V.G.1(a), submits this Motion for Leave to File Under Seal. Plaintiff seeks to file Exhibits F, J, L, and N to its Verified Complaint under seal.

The grounds in support of Plaintiff's requested relief are more fully set forth in the Memorandum in Support of this Motion, filed contemporaneously herewith.

RESPECTFULLY SUBMITTED this the 10th day of June, 2021.

/s/ Beth A. Stanfield

Beth A. Stanfield (N.C. State Bar No. 36296)

Thomas Babel (N.C. State Bar No. 35004)

Laura K. Greene (N.C. State Bar No. 47771)

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CERTIFICATE OF SERVICE

The undersigned does hereby certify that a copy of the foregoing **PLAINTIFF'S MOTION FOR LEAVE TO FILE UNDER TO SEAL** has been filed with the Clerk for the United States District Court, Eastern District of North Carolina, using the electronic filing system of the Court and that the foregoing was served upon the following persons by depositing a copy of the same in the United States Mail in an envelope, postage prepaid, addressed as follow:

- ✓ By placing a copy, contained in a first-class, postage paid wrapper, into a depository under the exclusive custody of the United States Postage Service, addressed to the parties as indicated below:

Fin Cap, Inc. d/b/a "Blueacorn.co"
c/o Legalinc Corporate Services Inc.
5830 E 2nd St Ste 8
Casper, WY 82609

Blue Oak Forest, LLC
c/o Delaware Registered Agents &
Incorporators, LLC
19 Kris Court
Newark, DE 19702

Blue Acorn PPP, LLC
c/o Radix Law, PLC, Registered Agent
Jeff Meyerson
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Nathan Reis
4747 N. Scottsdale Road, Unit C
Scottsdale, AZ 85251

James M. Flores
7833 E. Harvard Street
Scottsdale, AZ 85257

This the 10th day of June, 2021.

/s/ **Beth A. Stanfield**
Beth A Stanfield
Thomas Babel
Laura K. Greene
Attorneys for Plaintiff