

Simon S. Grille (State Bar No. 294914)
sgrille@girardsharp.com
GIRARD SHARP LLP
601 California Street, Suite 1400
San Francisco, CA 94108
Telephone: (415) 981-4800

Jorge L. Piedra (Florida Bar No. 88315)
(*Pro Hac Vice*)
jpiedra@kttlaw.com
Dwayne A. Robinson (Florida Bar No. 99976)
(*Pro Hac Vice*)
drobinson@kttlaw.com
Michael R. Lorigas (Florida Bar No. 123597)
(*Pro Hac Vice*)
mlorigas@kttlaw.com

KOZYAK TROPIN & THROCKMORTON
2525 Ponce de Leon Boulevard, 9th Floor
Miami, Florida 33134
Telephone: 305-372-1800

Attorneys for Benworth Capital Partners, LLC

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

OTO ANALYTICS, LLC f/k/a OTO
ANALYTICS, INC. d/b/a WOMPLY,

Petitioner,

v.

BENWORTH CAPITAL PARTNERS, LLC,

Respondent.

Case No. 3:24-cv-3975 (AMO)

**RESPONDENT'S STATEMENT OF NON-
OPPOSITION TO PETITIONER'S
MOTION TO CONSOLIDATE**

N.D. Cal. L.R. 7-3

Pursuant to Local Rule 7-3(b), and in line with Benworth's prior proposal to consolidate briefing in these proceedings (*see* ECF No. 46), Respondent Benworth Capital Partners, LLC respectfully submits this Statement of Non-Opposition to Petitioner's motion to consolidate *Oto Analytics, LLC v. Benworth Capital Partners LLC*, Civil No. 3:24-cv-03975-AMO (N.D. Cal.) and *Benworth Capital Partners LLC v. Oto Analytics, LLC*, Civil No. 3:24-cv-4840-AMO (N.D. Cal.). *See* ECF No. 50.

Dated: September 11, 2024

Respectfully submitted,

/s/ Simon S. Grille

Simon S. Grille (State Bar No. 294914)

sgrille@girardsharp.com

GIRARD SHARP LLP

601 California Street, Suite 1400

San Francisco, CA 94108

Telephone: (415) 981-4800

Jorge L. Piedra (Florida Bar No. 88315)

(*Pro Hac Vice*)

jpiedra@kttlaw.com

Dwayne A. Robinson (Florida Bar No. 99976)

(*Pro Hac Vice*)

drobinson@kttlaw.com

Michael R. Lorigas (Florida Bar No. 123597)

(*Pro Hac Vice*)

mlorigas@kttlaw.com

KOZYAK TROPIN & THROCKMORTON

2525 Ponce de Leon Boulevard, 9th Floor

Miami, Florida 33134

Telephone: 305-372-1800

Attorneys for Benworth Capital Partners, LLC