

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

OTO ANALYTICS, LLC,	§	
	§	
Plaintiff,	§	
v.	§	
	§	
BENWORTH CAPITAL PARTNERS PR	§	
LLC; BENWORTH CAPITAL PARTNERS,	§	
LLC; BERNARDO NAVARRO and	§	
CLAUDIA NAVARRO,	§	
	§	Civil No. 23-01034 (GMM) <i>cons.</i> Civil
Defendants.	§	No. 24-01313 (GMM)
	§	
FEDERAL RESERVE BANK OF SAN	§	
FRANCISCO,	§	
	§	
Plaintiff-Intervenor,	§	
	§	
v.	§	
OTO ANALYTICS, LLC; BENWORTH	§	
CAPITAL PARTNERS PR, LLC;	§	
BENWORTH CAPITAL PARTNERS, LLC;	§	
BERNARDO NAVARRO and CLAUDIA	§	
NAVARRO,	§	
	§	
Defendants in Intervention.	§	
	§	

MOTION TO RESTRICT WOMPLY’S MOTION TO COMPEL

Pursuant to Standing Order No. 9 for the United District Court for the District of Puerto Rico, and in accordance with the October 7, 2024 Protective Order in this action (“**Protective Order**”; ECF No. 176), Plaintiff Oto Analytics, LLC (f/k/a Oto Analytics, Inc. d/b/a Womply) (“**Womply**”), by and through its undersigned counsel, seeks leave to file its Motion to Compel (1) Responses to Interrogatory Nos. 1, 2, and 4 to the Navarros; (2) Documents Responsive to Document Requests Nos. 6, 7, 11, and 12 to the Navarros; and (3) Documents Responsive to Document Request No. 18 to Benworth FL and Benworth PR (“**Motion to Compel**”) and exhibits

restricted to viewing by the parties and to publicly file its Motion to Compel and exhibits with redactions.

The Motion to Compel quotes, describes, and references four documents that Defendants designated as “Confidential” under the Protective Order, and attaches these four documents as exhibits. Womply seeks to redact the material Defendants designated as “Confidential” in its public filing and file the unredacted Motion to Compel and exhibits restricted to viewing by the parties. Womply takes no position on whether such material is properly restricted to reviewing by the parties. Because Defendants have designated this material “Confidential,” it is Defendants’ burden to justify denying public access to this material. *See* Standing Order No. 9 at 4 (“Stipulations between the parties are insufficient to justify restricted access.”).

Dated: December 6, 2024

Of Counsel:

Willkie Farr & Gallagher LLP

Respectfully submitted,

By: /s/ Alexander L. Cheney

By: /s/ Alejandro J. Cepeda Diaz

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CERTIFICATE OF SERVICE

The undersigned certifies that on December 6, 2024, the foregoing document was filed with the Clerk of the Court using CM/ECF, which sent notices to all parties receiving notifications through the CM/ECF system.

Dated: December 6, 2024

By: /s/ Alejandro J. Cepeda Diaz

Attorney for Plaintiff Oto Analytics, LLC