

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

GRAND ISLE GAMES, LLC,)	
)	Case No.: 3:25-cv-00390
Plaintiff,)	
)	Judge: Aleta A. Trauger
v.)	
)	Magistrate Judge:
THE ENTITIES, PARTNERSHIPS, AND)	
UNINCORPORATED ASSOCIATIONS)	
LISTED ON SCHEDULE A,)	JURY DEMAND
)	
Defendants.)	

**PLAINTIFF’S MOTION FOR LEAVE TO FILE EXHIBITS TO DECLARATION OF G.
EDWARD POWELL III UNDER SEAL**

Plaintiff Grand Isle Games, LLC (“Plaintiff”), by and through its undersigned counsel, respectfully moves this Court for leave to file Exhibits 1 and 2 to the contemporaneously filed Declaration of G. Edward Powell III in Support of Plaintiff’s Motion for Preliminary Injunction (the “Powell PI Declaration”) under seal.

In support of this Motion, Plaintiff states as follows:

1. Exhibit 1 to the Powell PI Declaration consists of true and correct copies or representative examples of the emails sent to the Subject Defendants, effectuating service of process pursuant to the Court’s Order authorizing alternative service. These emails necessarily contain the specific email addresses used for service.
2. Exhibit 2 to the Powell PI Declaration is a list identifying the Subject Defendants against whom a Preliminary Injunction is sought, providing at least one email address used for service for each Subject Defendant, and explaining the basis for Plaintiff’s confidence that the email address corresponds to that specific Defendant. This exhibit, therefore, also contains numerous private email addresses.

3. Good cause exists to file these exhibits under seal. The email addresses contained within Exhibits 1 and 2 constitute private contact information obtained through Plaintiff's diligent efforts, including expedited discovery from third-party platforms and investigation as authorized by this Court. Public disclosure of this extensive list of private email addresses could lead to their misuse, such as by subjecting the listed individuals/entities to unsolicited contact outside the formal litigation process.
4. The Sixth Circuit permits sealing court documents where a party demonstrates a "compelling interest that outweighs the public's interest in disclosure." *Shane Grp., Inc. v. Blue Cross Blue Shield of Mich.*, 825 F.3d 299, 305 (6th Cir. 2016). Here, Plaintiff's interest in protecting the private contact information of largely foreign defendants, obtained through Court-authorized means for the specific purpose of litigation, presents a compelling reason for sealing.
5. This approach is consistent with the Court's prior orders in this action to seal sensitive defendant-identifying information, such as Schedule A to the Complaint (D.E. 17, Finding I.1), to prevent frustration of the Court's orders and to protect the litigation process. The public interest in accessing these specific, private email addresses at this stage is minimal compared to the potential for misuse or compromise of Plaintiff's ongoing efforts.
6. Plaintiff will file the Powell PI Declaration itself on the public docket, referencing these exhibits as being filed under seal, and will file redacted copies of the exhibits with the specific email addresses redacted on the public docket.

WHEREFORE, Plaintiff Grand Isle Games, LLC respectfully requests that this Court grant its Motion and enter an Order permitting the unredacted versions of Exhibits 1 and 2 to the Declaration of G. Edward Powell III in Support of Plaintiff's Motion for Preliminary Injunction to be filed and maintained under seal.

Dated: May 27, 2025

Respectfully submitted,

/s/ Chanelle Acheson

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