

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

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

PLAINTIFF’S MOTION TO UNSEAL PREVOIUSLY SEALED FILINGS

Plaintiff Grand Isle Games, LLC (“Plaintiff”), by and through its undersigned counsel, respectfully moves this Court for an Order unsealing certain documents previously filed or maintained under seal in this action.

I. BACKGROUND

On April 22, 2025, this Court entered an *Ex Parte* Temporary Restraining Order (D.E. 17) (the “TRO”). The TRO, along with Plaintiff’s Complaint, its Motion for Temporary Restraining Order, supporting declarations and memorandum of law, and Schedule A identifying Defendants (collectively, the “Initial TRO Filings”), were filed or maintained under seal. (D.E. 17, Finding I.1). The Court found good cause for *ex parte* relief and sealing, noting a “significant risk that immediate, irreparable injury will occur if Defendants receive notice of these proceedings and have an opportunity to transfer assets, change storefront names, or otherwise conceal their identities and infringing activities before the Court can issue relief.” (D.E. 17, Finding I.1).

Subsequently, certain motions to extend the TRO and related documents were also filed under seal (the “Extension Filings”).

Since the issuance of the TRO, Plaintiff has diligently worked to effectuate the Court's Orders. Service of the TRO, Complaint, and subsequent relevant filings has been made upon numerous third-party e-commerce platforms, payment processors, and upon many of the Defendants identified on Schedule A, pursuant to the Court-authorized alternative service methods. (TRO, D.E. 17, § VI; *see also, e.g.*, Declaration of G. Edward Powell III in Support of Motion for Preliminary Injunction, ¶¶ 8-13). This case has now progressed to the preliminary injunction stage with respect to served Defendants.

II. ARGUMENT

There is a strong presumption in favor of public access to judicial documents and records. *See Shane Grp., Inc. v. Blue Cross Blue Shield of Mich.*, 825 F.3d 299, 305 (6th Cir. 2016) (“The public has a strong interest in obtaining the information contained in the court record.”). While the initial sealing of documents in this *ex parte* proceeding was justified to prevent Defendants from frustrating the Court's ability to grant relief before they could be served, the circumstances supporting that level of restriction have now substantially changed.

The primary rationale for sealing the Initial TRO Filings and subsequent Extension Filings was to prevent Defendants from taking evasive action *before* they received notice of this lawsuit and the Court's Orders. With service having been effected on numerous Defendants and third-party platforms, and with the matter proceeding to contested preliminary injunction hearings for served parties, this initial, overriding concern has been significantly mitigated. The “cat is out of the bag” for those Defendants who are now aware of the proceedings.

Continued sealing of all these foundational documents is no longer necessary to protect the interests that initially justified it, at least with respect to the general filings. The public's right of access to understand the basis for the Court's actions and the nature of this litigation now warrants

greater weight. Unsealing these documents will allow for greater transparency as the case progresses against the served Defendants.

Plaintiff acknowledges that certain specific information, such as the identities of Defendants on Schedule A who may not yet have been served or fully identified, might warrant continued protection if the Court deems it necessary to preserve the integrity of ongoing service efforts or investigations. However, for the bulk of the previously sealed motions, memoranda, declarations (with appropriate redactions if ordered for specific sensitive data not essential to the public record), and Court orders, the original justification for a complete seal has diminished.

Plaintiff therefore requests that the Court unseal the following documents, among others previously sealed in this matter:

1. Plaintiff's Amended Complaint (D.E. 9) and Schedule A thereto;
2. Plaintiff's Ex Parte Motion for Temporary Restraining Order (e.g., D.E. 11);
3. Plaintiff's Memorandum of Law in Support of Ex Parte Motion for Temporary Restraining Order (e.g., D.E. 12);
4. Supporting Declarations for the Motion for TRO (Declarations of Way-Kiani and Powell, D.E. 13, D.E. 14);
5. The Court's Ex Parte Temporary Restraining Order (D.E. 17) and extension orders;
6. Plaintiff's motions to extend the TRO, and supporting declarations and proposed orders.

Unsealing these core filings will serve the public interest by providing access to the Court's record now that the initial *ex parte* phase and the need for near-total secrecy regarding the case's existence have passed for a significant portion of the Defendants.

III. CONCLUSION

For the foregoing reasons, Plaintiff Grand Isle Games, LLC respectfully requests that the Court enter an Order unsealing the previously sealed filings in this action, including those

identified above, subject to any specific redactions or continued sealing of particular exhibits that the Court deems appropriate.

Dated: May 27, 2025

Respectfully submitted,

/s/ Chanelle Acheson_____

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