

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

SPORT SHOTS, LLC,	§	
	§	
Complainant,	§	
	§	
v.	§	Civ. Action No. _____
	§	
THE INDIVIDUALS, BUSINESS ENTITIES, AND	§	
UNINCORPORATED ASSOCIATIONS	§	
IDENTIFIED IN EXHIBIT 1,	§	
	§	
Respondents.	§	

COMPLAINANT’S APPLICATION TO FILE COMPLAINT UNDER SEAL

Pursuant to LR83.6.A, Complainant Sport Shots, LLC moves the Court for an order allowing Complainant to file under seal Complainant’s Original Complaint and its attached Exhibits 1-4.

1. The Complaint identifies the Complainant, the Respondents, and the information associated with the webstores that the Respondents use to reproduce and display Complainant’s trademark Golf Shots® and registered copyright-protected photographs © 2025 (the “Genuine Products”) to sell products (“Infringing Products”) through interactive commercial webstores (“Infringing Webstores”). Good cause exists for this requested order, for Respondents’ infringing activities are causing irreparable injury to Complainant, preventing Complainant from controlling use of its Genuine Products, and depriving Complainant of its exclusive rights under the Lanham Act and Title 17 of the United States Code protecting Copyrights. Accordingly, Complainant is seeking *ex parte* relief in this action.

2. While protective orders require good cause, sealing court records from public view is a higher bar. *June Med. Servs., L.L.C. v. Phillips*, 22 F.4th 512, 521 (5<sup>th</sup> Cir. 2022). “To decide

whether something be sealed, the court must undertake a 'document-by-document,' 'line-by-line' balancing of 'the public's common law right of access against the interests favoring nondisclosure.'" *Id.* Discretion should be "ungenerous" and only "congruent to the need." *Id.*

3. Temporarily sealing the Complaint will prevent Respondents from prematurely receiving notice of Complainant's investigation into the operation of their illegal business activities. In light of the illicit nature of infringement and the ability of infringers to practically eliminate their evidentiary trails by conducting their business entirely over the Internet, Complainant has good reason to believe that providing advance notice of Complainant's claims would cause Respondents to hide or transfer their wrongfully-obtained assets, inventory, and related records beyond the jurisdiction of this Court and thereby thwart the Court's ability to grant meaningful relief. *Cf.* 15 U.S.C. § 1116(d)(8) ("An order under this subsection, together with the supporting documents, shall be sealed until the person against whom the order is directed has an opportunity to contest such order, except that any person against whom such order is issued shall have access to such order and supporting documents after the seizure has been carried out.").

4. As Respondents engage in illegal, widespread trademark and copyright infringement, Complainant has no reason to believe Respondents will make their assets available for, or will adhere to, the authority of this Court any more than they have adhered to the Lanham Act and Title 17 of the United States Code protecting copyrights.

#### CONCLUSION

5. Complainant therefore respectfully requests that the Complaint and its attached Exhibits 1-4 remain under seal until the Court has the opportunity to issue preliminary injunctive

relief in this case, and, if granted, the relief ordered therein has been effectuated. Complainant will thereafter make all pleadings and orders filed in this matter available to Respondents.

Respectfully submitted,

THE WATTS LAW FIRM, P.C.

A handwritten signature in blue ink that reads "Joseph K. Watts". The signature is written in a cursive, flowing style.

JOSEPH K. WATTS  
FEDERAL BAR NO. 22812  
STATE BAR NO. 24005135  
JWATTS@WATTSLAW.NET  
11777 KATY FWY, STE. 507 S  
HOUSTON, TX 77041  
TELEPHONE: (832) 226.2491  
ATTORNEY FOR COMPLAINANT  
SPORT SHOTS, LLC