

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

XL SQUAD ENTERTAINMENT LLC.,	:	
a Georgia Limited Liability Company;	:	
TCHOUTA, an individual,	:	Civil Action File
	:	No. 1: 16-CV-0962
Plaintiffs,	:	
	:	Judge
	:	Thomas W. Thrash, Jr.
 vs.	 :	
	:	
MOUNT KENYA UNIVERSITY, a	:	
Foreign Institution; and	:	
DR. SIMON N. GICHARU CBS, an	:	
Individual,	:	
	:	
Defendants.	:	
<hr style="width: 45%; margin-left: 0;"/>	:	

NOTICE OF FILING

COMES NOW DEFENDANTS Mount Kenya University (MKU) and Dr. Simon N. Gicharu CBS, by and through their undersigned counsel, hereby give notice of the Request to Seal. (See Exhibit A, attached)

Respectfully Submitted

TIKU & ASSOCIATES, P.C.

**ATTORNEYS & COUNSELORS AT LAW
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August 30, 2016

Via Email s.es.amilaw@gmail.com and Certified Mail

**Sara G. Eslami, Esq.
Law Office of Sara Eslami
3355 Lenox Road, NE
Atlanta, Georgia 30326**

**Re: XL Squad et al v. Mount Kenya, et al
Northern District Court of Georgia (Atlanta)
Civil Action No. 1:16- CV-00962- TWT**

REQUEST TO SEAL

Dear Ms. Eslami:

Pursuant to Fed. R Civ. P. Rule 26 (5) (c) (1) (F), we request that any and all videotaped depositions including, but not limited to, Yves Tchouta and Simon Gichuru, be sealed and opened only on court order.

Said videotaped depositions shall not be used for any other purpose, other than the preservation of discovery and evidentiary matters at trial if directed by the Court to do so.

Sincerely,



**William A. Tiku
Attorney At Law**

Exhibit A

/s/ William Tiku

William A. Tiku

Georgia Bar No. 142256

Attorney for Defendants

Tiku & Associates P.C

2470 Windy Hill Rd. Suite 116

Marietta, Georgia 30067

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vs.	:	
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DR. SIMON N. GICHARU CBS, an	:	
Individual,	:	
	:	
Defendants.	:	

CERTIFICATE OF COMPLIANCE

This is to certify that the foregoing **NOTICE OF FILING** was prepared using 14 pt Times New Roman font.

This 30th day of August, 2016.

/s/ William Tiku

Georgia Bar No. 142256

Attorney for Defendants

Tiku & Associates P.C

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CERTIFICATE OF SERVICE

A copy of the foregoing **NOTICE OF FILING** was served by the Court's CM/ECF system, this 26th day of August 2016, to the following attorney of record in this case: Counsel for Plaintiffs

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/s/ William Tiku

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