EPSTEIN DRANGEL LLP
Ashly E. Sands (*pro hac vice*)
asands@ipcounselors.com
Danielle Futterman (*pro hac vice*)
dfutterman@ipcounselors.com
60 East 42nd Street, Suite 1250
New York, NY 10165
Telephone: 212-292-5390
Facsimile: 212-292-5391

Peter J. Farnese (SBN 251204)
pfarnese@ipcounselors.com
700 South Flower Street, Suite 1000
Los Angeles, CA 90017
Telephone: 310-356-4668
Facsimile: 310-388-1232

Attorneys for Plaintiff and
Ideal Living Management LLC

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

AIRDOCTOR, LLC, Plaintiff, v. LONNI, INC., et. al. Defendants.	Case No. 2:23-cv-00353-GW-AS **DISCOVERY MATTER** **DECLARATION OF CARLTON NEWSOME IN SUPPORT OF *EX PARTE* APPLICATION FOR PROTECTIVE ORDER, OR IN THE ALTERNATIVE, TO QUASH SUBPOENA TO MYRA NISHIZAKI** Judge: Hon. George H. Wu Magistrate: Hon. Alka Sagar Fact Disc. Cutoff: September 30, 2025 Expert Disc. Cutoff: November 7, 2025 Pretrial Conf: January 29, 2026 Trial Date: February 10, 2026

DECLARATION OF CARLTON NEWSOME

I, Carlton Newsome, do hereby declare and state as follows:

1. I am Senior Manager, H.R., for Ideal Living Management LLC ("Ideal Living").

2. I make this declaration based on my own personal knowledge or upon information and belief, and, if called upon to testify, would testify competently as to the matters contained therein.

3. Myra Nishisaki was previously employed with Ideal Living until February 2023.

4. In or about June 2011, Ms. Nishizaki executed a confidentiality agreement as part of her employment with Ideal Living.

5. A true and correct copy of the document, titled "Confidential Information and Inventions Agreement" is attached hereto as **Exhibit A**.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct, and that this Declaration was executed on September 24, 2025, at Sherman Oaks, California.

Carlton Newsome

CARLTON NEWSOME

Dec of Carlton Newsome

Final Audit Report 2025-09-24

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