

THE BUSINESS COURT OF TEXAS
FIRST DIVISION

CACTUS ROPES MEXICO, S. DE
R.L. DE C.V.,

Plaintiff,

v.

HATCO, INC.,

Defendant.

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Cause No. 26-BC01B-0045

NOTICE OF RULE 76a VERIFIED MOTIONS TO SEAL

TO THE HONORABLE JUDGE OF THE COURT:

Pursuant to Rule 76a of the Texas Rules of Civil Procedure, please take note that on June 2, 2026, Defendant RHE Hatco, Inc. ("Hatco") filed a Verified Motion for Leave to File Under Seal Response to Plaintiff Cactus Ropes Mexico, S. de R.L. de C.V.'s ("CRM") Application for Temporary Restraining Order and Declaration Attached Thereto (the "First Motion to Seal") in Cause No. 26-BC01B-0045, styled *Cactus Ropes Mexico, S. de R.L. de C.V. v. Hatco, Inc.*, pending in the First Division of the Business Court of Texas. On June 23, 2026, Hatco filed a second Verified Motion for Leave to File Under Seal Exhibits to Response to CRM's Opening Brief in Support of Application for Temporary Injunction (the "Second Motion to Seal") in that same action. On July 6, 2026, Hatco filed a third Verified Motion for Leave to File Under Seal Response to Plaintiff's Opening Brief in Support of Application for Temporary Injunction (the "Third Motion to Seal") in that same action.

This case involves a dispute regarding the respective rights of the parties

under a distribution agreement whereby CRM was to serve was the exclusive distributor of certain Hatco products (including Stetson-branded blocked headwear) in Mexico, the wholesale discount Hatco offered to CRM under that agreement, and allegations of each party's breach of that agreement. The briefings in the case necessarily involve some discussion of the terms of Hatco's licensing agreement with Stetson, which contains confidential and proprietary information, as well as nonpublic business information such as pricing details.

Specifically, Hatco's Response to CRM's Application for Temporary Restraining Order ("TRO Response") and the Declaration of Sean O'Toole attached thereto ("First O'Toole Declaration") refer to the terms of the Stetson-Hatco agreement, Stetson-branded retailers, and proprietary pricing terms between Hatco and Stetson-branded retailers. As stated in the First Motion to Seal, this confidential information has been redacted from the publicly filed versions of the TRO Response and First O'Toole Declaration. Hatco's Response to CRM's Opening Brief in Support of Application for Temporary Injunction ("TI Response") and the Declaration of Sean O'Toole ("Second O'Toole Declaration"), 2022 addendum to the Stetson licensing agreement ("2022 Addendum"), and Declaration of Tony Faoro ("Faoro Declaration") attached thereto likewise refer to the terms of the Stetson-Hatco agreement and proprietary pricing terms between Hatco, Stetson, and CRM. As stated in the Second Motion to Seal and Third Motion to Seal, this confidential information has been redacted from the publicly filed versions of the TI Response, Second O'Toole Declaration, and the Faoro Declaration; the 2022 Addendum is a wholly confidential

document which was submitted to the Court for *in camera* review.

Accordingly, Hatco seeks to seal its unredacted TRO Response, First O'Toole Declaration, TI Response, Second O'Toole Declaration, 2022 Addendum, and Faoro Declaration. The First, Second, and Third Motions to Seal will be heard in open court on July 23, 2026, at 9:30 a.m. This will be a virtual hearing held via Zoom at <https://txcourts.zoom.us/s/82209628716>. Any person may intervene and be heard concerning the sealing of the unredacted TRO Response, First O'Toole Declaration, TI Response, Second O'Toole Declaration, 2022 Addendum, and Faoro Declaration.

Dated: July 8, 2026

Respectfully submitted,

K&L GATES LLP

/s/ Victoria Forson

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**ATTORNEYS FOR DEFENDANT
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FILED: Jul 08, 2026, 3:09 pm

BY DEPUTY:
Lonnie Robinson

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document has been served in accordance with the Texas Rules of Civil Procedure on July 8, 2026.

/s/ Victoria Forson

Victoria Forson