

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Mphasis Corporation,
Plaintiff,

v.

Albert Rojas,
Defendant.

Case No. 1:25-cv-03175 (JMF)

LETTER MOTION FOR LEAVE TO FILE CLARIFICATION OF THE RECORD

Defendant respectfully seeks leave pursuant to ECF No. 555 to file a short clarification concerning Plaintiff's June 5, 2026 submission (ECF No. 558). The proposed filing would not seek reconsideration of any prior ruling, including prior rulings concerning joinder. Rather, it would clarify that Defendant repeatedly raised QBE's role through multiple docket submissions, including ECF Nos. 94, 96, 149, and 193, and would further note that Plaintiff's current request for permanent injunctive relief expressly seeks restrictions governing Defendant's future conduct involving both Mphasis and QBE. Defendant respectfully submits that this clarification may assist the Court in evaluating the procedural record and the issues identified in ECF No. 555, including the parties' continuing factual disputes regarding the operational environment, the QBE-issued laptop, endpoint governance, communications involving QBE personnel, and related events underlying Plaintiff's requested relief. The proposed filing will be limited in scope, will not exceed four pages, and is submitted solely to preserve the accuracy of the record and assist the Court in evaluating the issues presently before it.

Respectfully submitted,

Albert Rojas
Defendant, Pro Se