

**IN THE COURT OF COMMON PLEAS
SUMMIT COUNTY, OHIO**

<p>MEMBER WILLIAMS, <i>et al.</i>,</p> <p style="text-align: center;">Plaintiffs,</p> <p style="text-align: center;">vs.</p> <p>KISLING, NESTICO & REDICK, LLC, <i>et al.</i>,</p> <p style="text-align: center;">Defendants.</p>	<p>Case No. 2016-CV-09-3928</p> <p>Judge James A. Brogan</p> <p>Plaintiffs' Motion for Leave to File under Seal the Deposition Transcript of Amanda Lantz</p>
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In accordance with the September 12, 2017 protective order, Plaintiffs hereby seek leave to file under seal the deposition transcript of Amanda Lantz. *See* protective order, Section 8.d, p. 9 (“a party seeking to file a brief, pleading or exhibit under seal shall first file a motion for leave to file under seal prior to filing such brief, pleading, or exhibit.”); *see also id.*, Section 8.c, p.8 (“To the extent that it is necessary for a party to discuss the contents of any confidential information ... in a written pleading, then such portion ... may be filed under seal with leave of Court.”).

Plaintiffs again have no choice to manually file “pleadings or documents under seal,” because the KNR Defendants have designated the entire deposition transcript of Amanda Lantz as “confidential.” *Id.* at Section 8, p. 7-8. (“[T]o the extent that a brief, memorandum, or pleading references any document marked as” confidential, then the pleading “shall refer the Court to the particular exhibit filed under seal without disclosing the contents of any confidential information.”). Once the KNR Defendants issue specific confidentiality designations regarding Amanda Lantz’s deposition testimony, Plaintiffs will promptly file a copy of such transcript reflecting those specific portions the KNR Defendants believe are “confidential,” in accordance with the protective order.

Because the Defendants have insisted that the entire deposition transcript of Amanda Lantz is “confidential” under the protective order, good cause exists to grant Plaintiffs leave to file under seal the deposition transcript of Amanda Lantz.

Respectfully submitted,

/s/ Rachel Hazelet

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Certificate of Service

The foregoing document was filed on April 1, 2019, using the Court’s electronic-filing system, which will serve copies on all necessary parties.

/s/ Rachel Hazelet

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