

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

In re: WATTS COORDINATED
PRETRIAL PROCEEDINGS)
) Master Docket Case No. 19-cv-01717
)
) Judge Franklin U. Valderrama
)
) Magistrate Judge Sheila M. Finnegan
)

THIS DOCUMENT RELATES TO ALL CASES

**PLAINTIFFS' UNOPPOSED MOTION FOR LEAVE TO FILE
INSTANTER TWO EXHIBITS UNDER SEAL**

Plaintiffs respectfully request leave to file two exhibits under seal for their Motion to Quash Defendants' Deposition Subpoenas and Pause Non-Agreed Depositions (the "Motion) pursuant to Local Rule 26.2, stating in support as follows:

1. Two of the exhibits that Plaintiffs seek to attach to their Motion are statements that occurrence witnesses provided to COPA.
2. When COPA produced those statements in the litigation, they were marked as Confidential under the Confidentiality Order in this case.
3. Plaintiffs seek leave to file these statements under seal to comply with the Confidentiality Order. Dkt. 3.
4. Pursuant to Local Rule 26.2, Plaintiffs will file a public version of their Motion without these two exhibits and will provisionally file the documents electronically under seal.
5. For the foregoing reasons, Plaintiffs respectfully move this Honorable Court to grant their motion for leave to file their Exhibits C and D under seal.

Respectfully submitted,

/s/ Gianna Gizzi

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Plaintiffs*

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