1 FRED M. BLUM, ESQ. (SBN 101586) fblum@behblaw.com 2 ERIN K. POPPLER, ESQ. (SBN 267724) epoppler@behblaw.com 3 VIVY D. DANG, ESQ. (SBN 297714) vdang@behblaw.com 4 BASSI, EDLIN, HUIE & BLUM LLP 500 Washington Street, Suite 700 5 San Francisco, CA 94111 Telephone: (415) 397-9006 Facsimile: (415) 397-1339 6 7 Attorneys for Defendant TEXAS EASTERN OVERSEAS, INC. 8 9 10 UNITED STATES DISTRICT COURT 11 EASTERN DISTRICT OF CALIFORNIA 12 13 AMERIPRIDE SERVICES INC., Case No. 2:00-cv-00113-MCE-EFB 14 Plaintiffs. **DEFENDANT TEXAS EASTERN** OVERSEAS, INC.'S REQUEST AND 15 ORDER TO SEAL DOCUMENTS VS. 16 VALLEY INDUSTRIAL SERVICES, INC., a former California corporation, et al., Trial Date: October 17-19, 2016 17 Closing Argument: November 15, 2016 Defendants. 18 Judge: Hon. Morrison C. England 19 20 21 22 23 24 25 26 27 28 1928134

DEFENDANT TEXAS EASTERN OVERSEAS, INC.'S REQUEST AND ORDER TO SEAL DOCUMENTS

Pursuant to Local Rule 141 and the Stipulation and Protective Order entered by the Court on January 12, 2017, Defendant <u>TEXAS EASTERN OVERSEAS</u>, <u>INC.</u> ("TEO"), by and through its respective counsel, respectfully submits this request for the Court to enter an order sealing the documents listed below. Dkt. 1139.¹

The document to be approved for filing under seal is: Defendant Texas Eastern Overseas, Inc.'s Response to Plaintiff AmeriPride Services Inc.'s ("AmeriPride") Supplemental Brief. The total number of pages to be sealed is five (5) pages.

TEO requests that the documents be sealed indefinitely, unless the parties to this Action agree otherwise or as ordered by the Court. The only persons permitted access to the sealed documents, other than the Court and its personnel, will be those who have been granted access by AmeriPride and have completed the "Acknowledgment And Agreement To Be Bound," attached as Exhibit A to the Stipulation and Protective Order, Dkt. 1139.

The basis for sealing these documents is the confidential nature of the materials contained therein, as set forth in the Stipulation and Protective Order, Dkt. 1139.

The Request and Proposed Order to Seal Documents, the accompanying Notice, and all documents covered by the request are being served on all parties on the same day as this notice.

Date: January 30, 2017 BASSI, EDLIN, HUIE & BLUM LLP

By: /s/ Vivy D. Dang

FRED M. BLUM ERIN K. POPPLER VIVY D. DANG Attorneys for Defendant TEXAS EASTERN OVERSEAS, INC.

¹ "Dkt." refers to the Court's ECF Docket number for this action.

ORDER

Defendant Texas Eastern Overseas, Inc.'s Request to Seal is GRANTED. The following document is approved for filing under seal: Defendant Texas Eastern Overseas, Inc.'s Response to Plaintiff AmeriPride Services Inc.'s ("AmeriPride") Supplemental Brief.

IT IS SO ORDERED.

Dated: February 7, 2017

MORRISON C. ENGLAND, JR UNITED STATES DISTRICT JUDGE