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5 INDUSTRIES, INC., HYNES CHILDREN  
TF LIMITED and MICHAEL HYNES  
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8 UNITED STATES DISTRICT COURT  
9 EASTERN DISTRICT OF CALIFORNIA

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11 SACRAMENTO E.D.M., INC., a California  
corporation; DAN FOLK, an individual,

12 Plaintiffs,

13 v.

14 HYNES AVIATION INDUSTRIES, INC.  
15 dba HYNES AVIATION SERVICES, an  
Oklahoma corporation; HYNES  
16 CHILDREN TF LIMITED, a business  
entity, form unknown; MICHAEL K.  
17 HYNES, an individual; and DOES 1  
through 50, inclusive,

18 Defendants.  
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Case No. 2:13-CV-00288-MCE-KJN

**STIPULATION AND ORDER TO SEAL  
EXHIBIT AND REPLACE WITH  
REDACTED EXHIBIT**

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21 TO THE COURT AND ALL PARTIES AND THEIR ATTORNEYS OF RECORD:  
22 NOTICE IS HEREBY GIVEN that the parties hereby stipulate by and through their  
23 respective attorneys that Exhibit 1 attached to Exhibit A to the Declaration of Thomas W. Barth  
24 in Support of Motion for Leave to File Counterclaim and for Amendment of Pretrial Scheduling  
25 Order (Pages 9 of 50 through 29 of 50, Document No. 54-1 of the Court Docket) filed in this  
26 action on July 21, 2014 be sealed and replaced with a completely redacted copy per agreement of  
27 counsel. Accordingly, the parties request the Court seal the currently filed Exhibit 1 and permit a  
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1 properly redacted copy be filed in its place. Attached to this stipulation is the proposed Exhibit 1,  
2 with complete, appropriate redaction.

3 Respectfully submitted,

4 Dated: August 8, 2014. BARTH DALY LLP

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6 By /s/Thomas W. Barth  
7 THOMAS W. BARTH  
8 Attorneys for Defendants HYNES AVIATION  
9 INDUSTRIES, INC., HYNES CHILDREN TF LIMITED  
10 and MICHAEL HYNES

11 FOOS GAVIN LAW FIRM, P.C.


12 Dated: August 8, 2014. By /s/Sean Gavin  
13 SEAN GAVIN  
14 Attorneys for Plaintiffs SACRAMENTO  
15 E.D.M. INC., and DAN FOLK

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17 **ORDER**

18 Good Cause Appearing, IT IS HEREBY ORDERED Exhibit 1 to Exhibit A of the  
19 Declaration of Thomas W. Barth in Support of Motion for Leave to File Counterclaim and for  
20 Amendment of Pretrial Scheduling Order (Pages 9 of 50 through 29 of 50, Document No. 54-1 of  
21 the Court Docket) be SEALED and the replacement Exhibit 1 (ECF No. 62 at 4-23), redacted to  
22 eliminate private information, also be FILED.

23 **IT IS SO ORDERED.**

24 Dated: August 22, 2014

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27 MORRISON C. ENGLAND, JR., CHIEF JUDGE  
28 UNITED STATES DISTRICT COURT