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 13 NATIONWIDE MUTUAL INSURANCE COMPANY

14 UNITED STATES DISTRICT COURT

15 EASTERN DISTRICT OF CALIFORNIA

16 ANTHONY MARC MOSTAJO, and  
 ELAINE QUEDENS, on behalf of himself  
 17 and all others similarly situated,

18 Plaintiffs,

19 v.

20 NATIONWIDE MUTUAL INSURANCE  
 COMPANY, and Does 1 through 50,  
 21 inclusive,

22 Defendant.

Case No. 2:17-CV-00350-JAM-AC

**[PROPOSED] ORDER GRANTING  
 DEFENDANT’S REQUEST TO SEAL  
 CONFIDENTIAL DOCUMENTS AND  
 INFORMATION IN SUPPORT OF  
 OPPOSITION AND CROSS-MOTION FOR  
 PARTIAL SUMMARY JUDGMENT**

Date: October 2, 2018  
 Time: 1:30 p.m.  
 Ctrm.: 6, 14th Floor  
 Judge: Honorable John A. Mendez

1           Having considered Defendant NATIONWIDE MUTUAL INSURANCE  
2 COMPANY's Request to Seal Documents in Support its Opposition and Cross-Motion for Partial  
3 Summary Judgment of Defendant's Twenty-First Affirmative Defense ("Motion"), this Court hereby  
4 finds good cause to GRANT said Request.

5           IT IS ORDERED that the following confidential documents and information shall be  
6 sealed:

- 7           • Exhibits B-E attached to the Declaration of Robert Watts consisting of the  
8 following:
  - 9           ○ **Exhibit B**, Nationwide Insurance Companies and Affiliates Plan for *Your*  
10 *Time* and Disability Income Benefits, Amended and Restated as of  
11 January 1, 2013, Bates No. DNM000539-608, designated "Confidential"  
12 pursuant to the Parties' Stipulated Protective Order;
  - 13           ○ **Exhibit C**, First through Tenth Amendments to Nationwide Insurance  
14 Companies and Affiliates Plan for *Your Time* and Disability Income  
15 Benefits, Amended and Restated as of January 1, 2013, Bates No.  
16 DNM000607-631, designated "Confidential" pursuant to the Parties'  
17 Stipulated Protective Order;
  - 18           ○ **Exhibit D**, Nationwide Insurance Companies and Affiliates Plan for *Your*  
19 *Time* and Disability Income Benefits, Amended and Restated as of June 7,  
20 2017, Bates No. DNM013445-13512, designated "Confidential" pursuant  
21 to the Parties' Stipulated Protective Order; and
  - 22           ○ **Exhibit E**, Nationwide Trust Company, FSB a division of Nationwide  
23 Bank, Amended and Restated Directed Trust Agreement, Bates No.  
24 DNM013424-13444, designated "Confidential" pursuant to the Parties'  
25 Stipulated Protective Order.
- 26           • Exhibits A-F attached to the Declaration of Jennifer Kemp consisting of the  
27 following:
  - 28           ○ **Exhibit A**, 2016 Form 5500 for Nationwide Insurance Companies &

1 Affiliates Plan for Your Time and Disability Income Benefits, Bates No.  
2 DNM013354-13386, designated “Confidential” pursuant to the Parties’  
3 Stipulated Protective Order;

4 ○ **Exhibit B**, 2016 Form 990 for the Nationwide Insurance Co & Affiliates  
5 Health Care Trust, Bates No. DNM013405-13423, designated  
6 “Confidential” pursuant to the Parties’ Stipulated Protective Order;

7 ○ **Exhibit C**, 2014 Form 5500 for Nationwide Insurance Companies &  
8 Affiliates Plan for Your Time and Disability Income Benefits, Bates No.  
9 DNM013290-13321, designated “Confidential” pursuant to the Parties’  
10 Stipulated Protective Order;

11 ○ **Exhibit D**, 2015 Form 5500 for Nationwide Insurance Companies &  
12 Affiliates Plan for Your Time and Disability Income Benefits, Bates No.  
13 DNM000468-499, designated “Confidential” pursuant to the Parties’  
14 Stipulated Protective Order

15 ○ **Exhibit E**, 2014 Form 990 for the Nationwide Insurance Co & Affiliates  
16 Health Care Trust, Bates No. DNM013271-13289, designated  
17 “Confidential” pursuant to the Parties’ Stipulated Protective Order;

18 ○ **Exhibit F**, 2015 Form 990 for the Nationwide Insurance Co & Affiliates  
19 Health Care Trust, Bates No. DNM000500-517, designated “Confidential”  
20 pursuant to the Parties’ Stipulated Protective Order;

21 IT IS SO ORDERED. The unredacted exhibits to the declarations of Robert Watts  
22 and Jennifer Kemp, shall be sealed for the duration of the litigation and cannot be unsealed without  
23 subsequent order from this Court.

24 Dated: 9/5/2018

/s/ John A. Mendez

HON. JOHN A. MENDEZ.  
UNITED STATES DISTRICT JUDGE

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