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11 **UNITED STATES DISTRICT COURT**
 12 **NORTHERN DISTRICT OF CALIFORNIA**

13)	Case No. C04-0098 SI
14)	
14)	DEFENDANT’S ADMINISTRATIVE
14)	MOTION FOR LEAVE TO FILE
15)	UNDER SEAL (1) PARKER’S
15)	SATCHELL TIME RECORDS, (2)
16)	PARKER’S TELEPHONE RECORDS,
16)	(3) PARKER’S PERSONAL
17)	COMPUTER RECORDS AND (4)
17)	CERTAIN PORTIONS OF THE
18)	PARTIES’ PLEADINGS THAT
18)	REFERENCE THESE MATERIALS,
19)	INCLUDING (A) DECLARATION OF
19)	BARAK J. BABCOCK IN SUPPORT OF
20)	DEFENDANT’S MOTION TO COMPEL
20)	DISCOVERY AND (B) DEFENDANT’S
21)	REPLY MEMORANDUM IN SUPPORT
21)	OF ITS MOTION TO COMPEL
22)	DISCOVERY

14 EDWARD ALVARADO, JOHN AZZAM,
 CHARLOTTE BOSWELL, TANDA BROWN,
 15 BERTHA DUENAS, PERNELL EVANS,
 CHARLES GIBBS, JANICE LEWIS, MARIA)
 16 MUNOZ, KEVIN NEELY, LORE PAOGOFIE,
 DYRONN THEODORE, LASONIA WALKER)
 17 and CHRISTOPHER WILKERSON,
 18 Plaintiffs,
 v.
 19 FEDEX CORPORATION, a Delaware
 20 corporation, dba FEDEX EXPRESS,
 21 Defendant.

Judge: Hon. Susan Illston

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 26 Defendant’s Administrative Motion For Leave To File Under Seal (1) Parker’s *Satchell* Time Records, (2) Parker’s
 27 Telephone Records, (3) Parker’s Personal Computer Records And (4) Certain Portions Of The Parties’ Pleadings
 28 That Reference These Materials, Including (A) Declaration Of Barak J. Babcock In Support Of Defendant’s Motion
 To Compel Discovery And (B) Defendant’s Reply Memorandum In Support Of Its Motion To Compel Discovery,
 Case No. C04-0098 SI

1 Defendant, Federal Express Corporation, hereby moves the Court pursuant to Civil L.R.
2 7-11 and 79.5(b) to file under seal (1) Parker's *Satchell* time records, (2) Parker's telephone
3 records, (3) Parker's personal computer records and (4) certain portions of the Parties' pleadings
4 that reference these materials, including (A) Declaration of Barak J. Babcock in Support of
5 Defendant's Motion to Compel Discovery and (B) Defendant's Reply Memorandum in Support
6 of Its Motion to Compel Discovery. FedEx submits the following in support of its Motion:
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8 1. The Special Master issued an Order (Docket No. 1378) directing FedEx to file
9 Parker's *Satchell* time records under seal.

10 2. Additionally, in discovery, FedEx received Parker's telephone records and
11 personal computer records, which Parker believes should be filed under seal.

12 3. The *Satchell* time records and Parker's telephone records and personal computer
13 records are (or will be) discussed in future pleadings in this Court regarding Parker's fee
14 petitions.
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16 4. FedEx requests that the Court permit it to file under seal exhibits to the
17 Declaration of Barak J. Babcock in Support of Defendant's Motion to Compel Discovery, which
18 contain Parker's *Satchell* time records, telephone records and computer records.

19 5. FedEx further requests that the Court permit it to file the portion of Defendant's
20 Reply Memorandum in Support of Its Motion to Compel Discovery, which directly quotes from
21 the *Satchell* time records under seal.
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23 6. Finally, FedEx requests that the Court issue an Order permitting the Parties to file
24 portions of future pleadings, which directly quote Parker's *Satchell* time records, telephone
25 records and/or computer records, under seal with the Court.

26 7. Should the Court grant the requested relief, FedEx will file "publicly" its
27 pleadings and only redact the portions of the pleading that references Parker's *Satchell* time
28

1 records, telephone records and/or computer records. FedEx will then file under seal a copy of
2 the non-redacted pleading.

3 For these reasons, FedEx respectfully requests that the Court issue an Order permitting
4 FedEx to file under seal (1) Parker's *Satchell* time records, (2) Parker's telephone records, (3)
5 Parker's personal computer records and (4) certain portions of the Parties' future pleadings that
6 directly quote these materials.
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9 DATED: April 15, 2009.

FEDERAL EXPRESS CORPORATION

10 By: /s/ Barak J. Babcock
11 Barak J. Babcock
12 Attorneys for Defendant
13 Federal Express Corporation
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