

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION**

PACIFIC STEEL GROUP,  
  
                    Plaintiff,  
  
          vs.  
  
COMMERCIAL METALS COMPANY, et  
al.,  
  
                    Defendants.

Case No. 4:20-cv-07683-HSG  
  
**STIPULATION AND ORDER TO  
EXTEND DEADLINE TO FILE  
REVISED JOINT OMNIBUS  
ADMINISTRATIVE MOTION TO SEAL**  
  
The Hon. Haywood S. Gilliam, Jr.  
  
Action Filed:   October 30, 2020  
Trial Date:     October 21, 2024

1 **STIPULATION**

2 Pursuant to Civil Local Rule 6-2, Plaintiff Pacific Steel Group (“Plaintiff”) and Defendants  
3 Commercial Metals Company, CMC Steel Fabricators, Inc., and CMC Steel US, LLC  
4 (collectively, “Defendants” and together with Plaintiff, the “Parties”), by and through their  
5 undersigned counsel, respectfully request that the Court enter the Parties’ below stipulation  
6 extending the deadline to file a revised Joint Omnibus Administrative Motion to Seal from July 9,  
7 2024 to July 19, 2024.

8 WHEREAS, on April 19, 2024, the Parties filed a Joint Omnibus Administrative Motion to  
9 Seal (Dkt. No. 289) pursuant to the Court’s April 10, 2024 Order Regarding Motions to Seal (Dkt.  
10 No. 286) directing the parties to file a single administrative motion to seal and proposed order  
11 consolidating all motions to seal that were then pending;

12 WHEREAS, on July 2, 2024, the Court directed the Parties to meet and confer and  
13 reconsider their sealing requests in light of the “compelling reasons” standard under *Kamakana v.*  
14 *City & County of Honolulu*, 447 F.3d 1172 (9th Cir. 2006), and ordered the Parties to file either a  
15 revised Joint Omnibus Administrative Motion to Seal that has more narrowly tailored requests for  
16 sealing/redactions or a joint statement explaining why the current omnibus motion meets the  
17 “compelling reasons” standard (Dkt. No. 354);

18 WHEREAS, on July 2, 2024, counsel for the Parties met and conferred and agreed to file a  
19 revised Joint Omnibus Administrative Motion to Seal that more narrowly tailors the Parties’  
20 requests for sealing/redactions to meet the “compelling reasons” standard;

21 WHEREAS, for the convenience of the Court, counsel for the Parties further agreed that  
22 the revised Joint Omnibus Administrative Motion to Seal would include any requests for  
23 sealing/redactions for information filed in connection with the Parties’ respective motions *in*  
24 *limine* (Dkt. Nos. 308, 314, 334, 339) which were filed after the Parties’ April 19, 2024 Joint  
25 Omnibus Administrative Motion to Seal;

26 WHEREAS, counsel for the Parties have begun to confer with their respective clients to  
27 more narrowly tailor the Parties’ requests for sealing/redactions to meet the “compelling reasons”  
28 standard;

1           WHEREAS, counsel for the Parties have begun to confer with pertinent third parties  
2 regarding more narrowly tailoring their requests for sealing/redactions to meet the “compelling  
3 reasons” standard;

4           WHEREAS, the Parties, pertinent third parties, and their respective counsel have limited  
5 availability prior to July 9, 2024, given scheduling conflicts around the Fourth of July holiday;

6           WHEREAS, the Parties have agreed to extend the deadline for filing the revised Joint  
7 Omnibus Administrative Motion to Seal to July 19, 2024, to accommodate the Parties’, pertinent  
8 third parties’, and their respective counsels’ scheduling conflicts and to provide sufficient time for  
9 the Parties and pertinent third parties to review and narrowly tailor their requests for  
10 sealing/redactions to meet the “compelling reasons” standard;

11           WHEREAS, no other deadlines will be altered or otherwise impacted by this extension, as  
12 set forth in the Declaration of Michelle Kao filed concurrently herewith; and

13           THEREFORE, IT IS HEREBY AGREED AND STIPULATED that the deadline to file a  
14 revised Joint Omnibus Administrative Motion to Seal shall be reset to July 19, 2024.

15           IT IS SO STIPULATED.

16 //  
17 //  
18 //  
19 //  
20 //  
21 //  
22 //  
23 //  
24 //  
25 //  
26 //  
27 //  
28 //

1 Dated: July 2, 2024

Dated: July 2, 2024

2  
3 By: /s/ Christopher C. Wheeler  
Christopher C. Wheeler (SBN 224872)  
4 Cameron J. Gibbs (SBN 346524)  
FARELLA BRAUN + MARTEL LLP  
5 One Bush Street, Suite 900  
San Francisco, CA 94104  
6 Telephone: (415) 954-4400  
Facsimile: (415) 954-4480  
7 cwheeler@fbm.com  
cgibbs@fbm.com

8 Benjamin D. Brown (SBN 202545)  
9 Daniel McCuaig (*pro hac vice*)  
Nathaniel D. Regenold (*pro hac vice*)  
10 COHEN MILSTEIN SELLERS  
& TOLL PLLC  
11 1100 New York Ave., NW, Fifth Floor  
Washington, DC 20005  
12 Telephone: (202) 408-4600  
Facsimile: (202) 408-4699  
13 bbrown@cohenmilstein.com  
dmccuaig@cohenmilstein.com  
14 nregenold@cohenmilstein.com

15 William C. Price (SBN 108542)  
Rachael L. McCracken (SBN 252660)  
16 QUINN EMANUEL URQUHART &  
SULLIVAN, LLP  
17 865 S. Figueroa Street, 10th Floor  
Los Angeles, CA 90017  
18 Telephone: (213) 443-3000  
Facsimile: (213) 443-3100  
19 williamprice@quinnemanuel.com  
rachaelmccracken@quinnemanuel.com

20 Steig D. Olson (*pro hac vice*)  
21 Nic Siebert (*pro hac vice*)  
QUINN EMANUEL URQUHART &  
22 SULLIVAN, LLP  
51 Madison Avenue, 22nd Floor  
23 New York, NY 10010  
Telephone: (212) 849-7000  
24 Facsimile: (212) 849-7100  
steigolson@quinnemanuel.com  
25 nicolassiebert@quinnemanuel.com

26 *Attorneys for Plaintiff Pacific Steel Group*

By: /s/ Steven Bizar  
Steven Bizar (*pro hac vice*)  
Agnese Nadalini (*pro hac vice*)  
David Costigan (*pro hac vice*)  
DECHERT LLP  
2929 Arch St.  
Philadelphia, PA 19104  
Telephone: 215.994.4000  
Facsimile: 215.994.2222  
Email: steven.bizar@dechert.com  
Email: agnese.nadalini@dechert.com  
Email: david.costigan@dechert.com

Shari Ross Lahlou (*pro hac vice*)  
Nathan Richardson (*pro hac vice*)  
DECHERT LLP  
1900 K Street, NW  
Washington, DC 20006  
Telephone: 202.261.3300  
Facsimile: 202.261.3333  
Email: shari.lahlou@dechert.com  
Email: nathan.richardson@dechert.com

Joseph Trujillo (SBN 305170)  
DECHERT LLP  
45 Fremont St., 26th Floor  
San Francisco, California 94105  
Telephone: 415.262.4500  
Facsimile: 415.262.4555  
Email: joseph.trujillo@dechert.com

By: /s/ Bonnie Lau  
Bonnie Lau (SBN 246188)  
Lena Gankin (SBN 333047)  
MORRISON & FOERSTER LLP  
425 Market Street  
San Francisco, California 94105-2482  
Telephone: 415.268.7000  
Facsimile: 415.268.7522  
Email: blau@mofo.com

*Attorneys for Defendants  
Commercial Metals Company;  
CMC Rebar West;  
CMC Steel US, LLC*

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**ECF ATTESTATION**

I, Christopher C. Wheeler, am the ECF User whose ID and password are being used to file this STIPULATION AND [PROPOSED ORDER] TO EXTEND DEADLINE TO FILE REVISED JOINT OMNIBUS ADMINISTRATIVE MOTION TO SEAL. In accordance with Civil Local Rule 5-1, concurrence in the filing of this document has been obtained from each of the other signatories, and I shall maintain records to support this concurrence for subsequent production for the Court if so ordered or for inspection upon request by a party.

Dated: July 2, 2024

FARELLA BRAUN + MARTEL LLP

By:           /s/ Christopher C. Wheeler            
Christopher C. Wheeler


1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**ORDER**

PURSUANT TO STIPULATION AND FOR GOOD CAUSE SHOWN, IT IS SO ORDERED.

**IT IS SO ORDERED.**

Dated: 7/3/2024

  
\_\_\_\_\_  
The Honorable Haywood S. Gilliam, Jr.  
UNITED STATES DISTRICT JUDGE