

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA**

MAUREEN TOFFOLONI,
as Administrator and Personal
Representative of the ESTATE
OF NANCY E. BENOIT,

Plaintiff,

vs.

LFP PUBLISHING GROUP, LLC,
d/b/a Hustler Magazine, et al.,

Defendant.

CASE NO. 1:08-cv-00421-TWT

**DEFENDANT’S NOTICE REQUESTING MANUAL FILING OF
CONFIDENTIAL ORIGINAL DISCOVERY MATERIAL UNDER SEAL**

Defendant LFP Publishing Group, LLC (“LFP”), through undersigned counsel, herewith requests that Plaintiff manually files with the Court under seal the following original transcripts together with all exhibits thereto:

- a. Transcript of the deposition of Larry Flynt;
- b. Transcript of the deposition of LFP Rule 30(b)(6) designee Bruce David.

Because the above-listed materials contain sensitive financial information, each of the above transcripts should be designated “Confidential” in accordance

with the Court's December 22, 2009 Stipulated Protective Order Governing Confidential Material and Inadvertent Production of Privileged Information, Docket Index 70, and, accordingly, should be filed under seal in accordance with Paragraph 9 of the Protective Order.

Respectfully submitted this 30th day of July 2010.

/s/ S. Derek Bauer

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CERTIFICATE OF SERVICE

This is to certify that I have this day filed the within and foregoing NOTICE REQUESTING MANUAL FILING OF CONFIDENTIAL ORIGINAL DISCOVERY MATERIAL UNDER SEAL via the CM/ECF system which will automatically send notification to Plaintiff's attorneys of record, who are participants in the CM/ECF system.

This 30th day of July 2010.

/s/ S. Derek Bauer

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