

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF LOUISIANA**

**HORNBECK OFFSHORE SERVICES,
LLC, et al.**

Plaintiffs,

and

DIAMOND OFFSHORE COMPANY,

Plaintiff-Intervenors,

v.

**THE CENTER FOR BIOLOGICAL
DIVERSITY, et al.,**

Defendant-Intervenors,

and

KENNETH LEE "KEN" SALAZAR, et al,

Defendants.

CIVIL ACTION No. 10-1663(F)(2)

SECTION F

JUDGE FELDMAN

MAGISTRATE 2

MAGISTRATE WILKINSON

**DEFENDANTS' MEMORANDUM IN SUPPORT OF CONSENT MOTION
TO FILE MEMORANDUM AND EXHIBITS UNDER SEAL**

Defendants, Kenneth Lee Salazar, the United States Department of the Interior, Robert Abbey, and the Bureau of Ocean Energy Management, Regulation, and Enforcement ("Defendants") hereby file this memorandum in support of their motion to file under seal Defendants' Opposition to Plaintiffs' Motion to Set the Amount of Attorneys' Fees and Costs and Defendants' supporting exhibits. Defendants have conferred with Plaintiffs who do not object to the relief sought herein.

Good cause exists for granting the motion. On February 9, 2011, Plaintiffs moved the Court to file the billings records of Jones Walker and Venable under seal "to protect from public

disclosure the sensitive, confidential and/or privileged information” in those records. (Dkt. #229). This Court granted Plaintiffs’ motion to seal documents on February 10, 2011. (Dkt. #200).

Plaintiffs filed the billings records of Jones Walker and Venable under seal as an appendix to their Motion to Set the Amount of Attorneys’ Fees and Costs. (Dkt. #233). Defendants’ Opposition to that Motion and supporting exhibits contain excerpts of those billing records. Given that Plaintiffs filed these records under seal, Defendants respectfully request to file their Opposition and supporting exhibits under seal to protect information that Plaintiffs have identified as “sensitive, confidential and/or privileged.” (Dkt. #229). Moreover, because the Defendants intend to find a redacted version of their Opposition on PACER, Defendants will seek Plaintiffs’ assistance in determining what information from their billings records in Defendants’ Opposition should be protected from public disclosure.

Accordingly, because Defendants’ Opposition and supporting exhibits contain excerpts of information that Plaintiffs filed under seal, Defendants respectfully request that the Court authorize them to file their Opposition and supporting exhibits under seal.

Respectfully submitted this 9th day of March, 2011.

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