UNITED STATES DISTRICT COURT DISTRICT OF MARYLAND

Baltimore Division

ALBERT SNYDER,

: Civ. No. 1:06-cv-01389-RDB Plaintiff

v.

FRED PHELPS, et al,

Defendant. :

DEFENDANTS' NOTICE AND MOTION TO FILE DOCUMENTS UNDER SEAL

Defendants Fred W. Phelps, Sr., and Westboro Baptist Church (collectively, Defendants), respectfully move, for the following grounds, to file the following documents -- being hand-delivered on August 6, 2007 -- under seal: Defendants' Motion To Reconsider Limits On Discovery, And Motion For Limited Extension Of Discovery, together with the attachments thereto (Dr.

Blumberg's IME report and excerpts from Plaintiff's deposition):

- The Court previously issued a confidentiality Order in 1. this civil action;
- On August 3, 2007, pro se Defendant Shirley Phelps-2. Roper e-mailed Plaintiff's counsel Sean Summers that she would file a similar motion under seal, unless Mr. Summers agreed to filing said document without being sealed.
- Mr. Summers replied, by e-mail, to file said document under seal.

- 4. Consequently, this Motion is being filed due to Plaintiff's desire for ongoing confidentiality in relation to the Confidentiality Order.
- 5. A full copy of said Motion, with full attachments, is being filed and mailed within twenty-four hours of the date of this Notice to Seal.

WHEREFORE, Defendants respectfully move for leave to file under seal their Motion To Reconsider Limits On Discovery, And Motion For Limited Extension Of Discovery,

Respectfully submitted,

/s/_____

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CERTIFICATE OF SERVICE

I certify that a copy of the foregoing document was served by first-class mail, postage-prepaid, on August 6, 2007, to:

Sean E. Summers, Esq. (also by the CM/ECF filing system)

Paul W. Minnich, Esq.

Rees Griffiths, Esq.

Craig Tod Trebilcock, Esq.

Becky Phelps-Davis (by mail only) 1216 Cambridge Topeka, KS 66604

Shirley Phelps-Roper (by mail only) 3640 Churchill Road Topeka, KS 66604

____/s/____

Jonathan L. Katz