UNITED STATES DISTRICT COURT DISTRICT OF MARYLAND

Baltimore Division

ALBERT SNYDER,	:		
	:		
Plaintiff	:	Civ. No.	1:06-cv-01389-RDB
	:		
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 mailed on August 30, 2007 -- under seal: Defendants' Reply to Opposition to Motion To Reconsider Limits On Discovery:

- The Court previously issued a confidentiality Order in this civil action;
- Defendants reincorporate by reference their grounds stated in their Sealing Notice and Motion accompanying their original Motion to Reconsider.

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

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Respectfully submitted,

_____/s/____ Jonathan L. Katz D.Md. Bar No. 07007 1400 Spring St., Suite 410 Silver Spring, MD 20910 Ph: (301) 495-4300 Fax: (301) 495-8815 jon@markskatz.com

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