

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 DOCUMENT UNDER SEAL

Defendants Fred W. Phelps, Sr., and Westboro Baptist Church (collectively, Defendants), respectfully move, for the following grounds, to file the following document -- being hand-filed at the Court on September 4, 2007 -- under seal: Defendants' proposed jury questionnaire questions:

1. The Court previously issued a confidentiality Order in this civil action;
2. Plaintiff may argue that some of the contents of the attached proposed questionnaire questions arguably fall within the confidentiality order.
3. Consequently, this Motion is being filed due to Plaintiff's desire for ongoing confidentiality in relation to the Confidentiality Order.
4. A full copy of said proposed questionnaire is being filed and mailed within twenty-four hours of the date of this Notice to Seal.

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing document was served by first-class mail, postage-prepaid, on September 4, 2007, to:

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

Paul W. Minnich, Esq.

Craig Tod Trebilcock, Esq.

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Honorable Richard D. Bennett (by hand)

Baltimore Division

101 W. Lombard Street

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(410) 962-2600

_____/s/_____
Jonathan L. Katz