UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

GEOFFREY A. HOLLIS, SHARON R. HOLLIS, EDMUND J. MANSOR, and ROBERTA M. MANSOR,

Plaintiffs,

v.

Civil Action No. 1:12-cv-10544-JGD

JPMORGAN CHASE BANK, N.A.,

Defendant.

DEFENDANT'S MOTION TO IMPOUND FEBRUARY 11, 2013 HEARING TRANSCRIPT

Pursuant to Local Rule 7.2, Defendant J.P. Morgan Chase Bank, N.A. ("Defendant") respectfully moves the Court for entry of an Order that the transcript of the February 11, 2013 hearing in the matter ("Transcript") be impounded. The Transcript contains references to and discussions about documents submitted by counsel for Geoffrey A. Hollis, Sharon R. Hollis, Edmund J. Mansor, and Roberta M. Mansor ("Plaintiffs") that are protected from disclosure by law.

In support of this motion, Defendant states as follows:

1. On February 11, 2013, this Court held a hearing regarding Plaintiffs' submission of filings on January 16, January 22, February 5 and February 6, 2013. At the hearing, Defendant argued that these filings contained information which is prohibited from disclosure by federal law, and in particular by 31 U.S.C. § 5318(g). Defendant requested, among other things, that Plaintiffs withdraw the filings containing federally-protected information. Defendant also requested that the hearing be sealed to maintain this protection.

2. Defendant contends that the Transcript will contain references to and discussions

about documents, the existence of which is prohibited by disclosure by federal law, and accordingly, any references to or discussions about such documents are also confidential.

3. Although no protective order has been agreed upon by the parties, Defendant believes that the Transcript should remain under seal until further order of the Court.

WHEREFORE, Defendant respectfully requests that this Court enter an Order for impoundment of the Transcript.

CONCLUSION

For the foregoing reasons, Defendant respectfully requests that the entry of the order sought herein.

Respectfully submitted, J.P. MORGAN CHASE BANK, N.A.

By its attorneys,

/s/ Beth I.Z. Boland Beth I.Z. Boland, BBO #553654 S. Elaine McChesney, BBO #329090 Jacqueline S. Delbasty, BBO #676284 Stephen J. Quinlan, BBO #679205 BINGHAM MCCUTCHEN LLP One Federal Street Boston, MA 02110 Tel: (617) 951-8000 Fax: (617) 951-8736

Date: February 19, 2013

CERTIFICATE OF SERVICE

I hereby certify that the above document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on February 19, 2013.

/s/ Stephen J. Quinlan Stephen J. Quinlan