

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

<p>In re:</p> <p>CELEXA AND LEXAPRO MARKETING AND SALES PRACTICES LITIGATION</p> <p>THIS DOCUMENT RELATES TO:</p> <p>ALL ACTIONS</p>	<p>MDL No. 2067</p> <p>Master Docket No. 09-MD-2067-(NMG)</p> <p>Hon. Nathaniel M. Gorton Hon. Marianne B. Bowler</p> <p>Case No. 13-CV-13113 (NMG) Case No. 14-CV-13848 (NMG)</p>
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**MOTION TO FILE CERTAIN DOCUMENTS UNDER SEAL PURSUANT TO
PROTECTIVE ORDER AND FOR LEAVE TO FILE BRIEFS IN EXCESS PAGES**

Plaintiffs PAINTERS AND ALLIED TRADES DISTRICT COUNCIL 82 HEALTH CARE FUND, DELANA KIOSSOVSKI, and RENEE RAMIREZ (collectively "Plaintiffs") respectfully move this Honorable Court for an order permitting Plaintiffs to file certain documents under seal and to file two briefs with excess pages.

SEALING REQUEST

1. The Parties entered into a Stipulated Protective Order, pursuant to Rule 26(c) of the Federal Rules of Civil Procedure, which governs all actions transferred to this Court and consolidated into MDL No. 2067, including the action listed above. (Doc. No. 83.)
2. Portions of Plaintiffs' Opposition to Forest's Motion for Summary Judgment and following exhibits, which are attached to the Decl. of R. Brent Wisner, contain information vital to Plaintiffs' position and have been deemed to contain "Confidential Information" by the Parties, pursuant to Sections 7-15 of the Protective Order: Exhibits 38, 76, 77, 96 through 101, 105, 108 through 111, 125, and 132 through 134.
3. Pursuant to Section 16 of the Protective Order, the Plaintiff seeks permission to file these Exhibits in accordance with all mandates of the Stipulated Protective Order and subject to the Local Rules of this Court.

Motion to file documents under seal is allowed; motion to file briefs in excess pages is allowed, in part, and denied, in part; plaintiff's oppositions to defendant's Daubert and summary judgment motions shall be limited to 30 pages each.

NMGorton, USDT 10/27/17