

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MISSOURI

MARK FAUGHN, TERRIE FAUGHN,  
MARVIN L. GLASS, CAROLYN S. GLASS,  
THOMAS MCINTYRE, DEBORAH  
MCINTYRE and ROGER SPARKS,

Plaintiffs,

v.

JPMORGAN CHASE BANK, N.A.,

Defendant.

Civil Action No. 4:14-cv-00245-BCW

**MOTION TO FILE UNDER SEAL DEFENDANT'S MOTION TO  
CLAW BACK CONFIDENTIAL MATERIALS AND STRIKE THE COMPLAINT**

Defendant JPMorgan Chase Bank, N.A. ("Chase"), by its undersigned counsel, hereby moves the Court for leave to file certain motion papers in this action under seal.

In anticipation of the hearing scheduled for Tuesday, March 25, 2014 in this matter, Chase intends to move to claw back certain privileged documents maintained by Plaintiffs in this action, and to strike the complaint in light of its reference to such privileged information. Chase seeks to file such papers under seal because its anticipated motion and supporting documents will make extensive reference to matters that are the subject of an absolute legal privilege under the Annunzio-Wylie Anti-Money Laundering provisions of the Bank Secrecy Act, 31 U.S.C. § 5318(g) and regulations promulgated thereunder.

For the foregoing reasons, Chase requests leave to file under seal its anticipated Motion to Claw Back Confidential Materials and Strike the Complaint, and supporting affidavits and documents.

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing document was filed utilizing the CM/ECF system which generated notice to all counsel of record.

/s/ Gardiner B. Davis \_\_\_\_\_  
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