

1 Plaintiffs Genine Cannata, Carolyn Davis, Joan E. Lewis, Sheila A. Rhodes,
2 Patricia Calvin, Connie Post and Lori Wilk, by and through their attorneys of record,
3 hereby move this Court to seal an un-redacted version of their Memorandum of Points
4 and Authorities in Opposition to Plaintiffs Motion for a Protective Order Regarding
5 Deposition of Rich Folk and an exhibit thereto. In support of this Motion, Plaintiffs state
6 the following:

7 1. On August 12, 2010, Defendants filed a Motion for a Protective Order
8 Regarding Deposition of Rich Folk. *See* Dkt. No. 198.

9 2. On August 31, 2010, Plaintiffs filed or will file a redacted version of their
10 opposition brief and attorney declaration to said Motion that refers to an exhibit that was
11 produced by Wyndham and was designated as “CONFIDENTIAL.”

12 3. Plaintiffs are in the process of contesting the confidential designation
13 pursuant to the procedures outlined in the Protective Order entered in this matter. It is
14 Plaintiffs’ position that WRDC.Cannata001019-22 is not confidential since it does not
15 contain trade secrets or proprietary business information.

16 4. In the interim, Plaintiffs respectfully request that the Court seal the un-
17 redacted version of their brief, attorney declaration and the exhibit Wyndham has
18 designated as confidential filed concurrently herewith.

19 5. Plaintiffs may move to file an un-redacted brief and to unseal the exhibit
20 once the confidentiality designation issue is resolved.

21 6. Plaintiffs will also send the Defendants a copy of the un-redacted version
22 of their brief.

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Respectfully submitted this 31st day of August, 2011.

By: /s/ Felicia Medina
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Attorney for Plaintiffs

IT IS SO ORDERED.



UNITED STATES MAGISTRATE JUDGE
DATED: 9-2-11

Certificate of Service

I certify that service of the foregoing “**PLAINTIFFS’ NOTICE OF MOTION AND MOTION TO SEAL EXHIBIT**” will be made this 31st day of August, 2011, by the email of the U.S. District Court to the following:

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