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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

OLIN CORPORATION, and PIONEER
AMERICAS, LLC d/b/a OLIN CHLOR
AKALI PRODUCTS,

Plaintiffs,

v.

CONTINENTAL CASUALTY COMPANY,
FACTORY MUTUAL INSURANCE
COMPANY, ZURICH AMERICAN
INSURANCE COMPANY, ZURICH
INSURANCE IRELAND, LTD., NATIONAL
UNION FIRE INSURANCE COMPANY of
PITTSBURGH, PENNSYLVANIA, and ACE
AMERICAN INSURANCE COMPANY,

Defendants.

CONTINENTAL CASUALTY COMPANY,
Plaintiff,

v.

OLIN CORPORATION,
Defendant.

Case No.: 2:10-CV-00623
Case No.: 2:10-CV-01298

**DEFENDANT CONTINENTAL
CASUALTY COMPANY’S MOTION TO
FILE DOCUMENTS UNDER SEAL IN
SUPPORT OF ITS MOTION *IN LIMINE*
TO EXCLUDE THE TESTIMONY OF
BURL DANIEL (DKT. #245)**

1 NOW COMES Defendant Continental Casualty Company (“Continental”), by and
2 through their undersigned attorneys of record, and for its Motion to File Documents Under Seal
3 in Support of its Motion *in Limine* to Exclude Testimony of Burl Daniel, states as follows:

4 1. On January 17, 2013, Defendant Continental filed its Motion *in Limine* to Exclude
5 Testimony of Burl Daniel (Dkt. #245).

6 2. Defendant Continental cited three exhibits in conjunction with its motion:

- 7 a. Exhibit A – Plaintiffs’ Rule 26(a)(2) Expert Disclosure
- 8 b. Exhibit B – Expert Report of Burl Daniel
- 9 c. Exhibit C – Deposition Transcript of Burl Daniel

10 3. In accordance with the Stipulated Protective Order filed by the Parties (Dkt. #63) and
11 the entered by this Court (Dkt. #65), Defendant Continental respectfully requests that the
12 exhibits cited in Defendant Continental’s Motion *in Limine* to Exclude Testimony of Burl Daniel
13 be filed under Seal as Confidential information in accordance with the Stipulated Protective
14 Order filed by the Parties (Dkt. #63) and the entered by this Court (Dkt. #65).

15 Dated this 21st day of January, 2013

16
17 Respectfully submitted,

18 ATTORNEYS FOR DEFENDANT
19 CONTINENTAL CASUALTY COMPANY

20 By: /s/ Jonquil Whitehead
21 Jonquil Whitehead
22 Nevada Bar # 10783
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26 /s/ Megan E. Ritenour
27 Peter E. Kanaris (*Pro Hac Vice*)
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ORDER

IT IS SO ORDERED this 23rd day of January, 2013.



Gloria M. Navarro
United States District Judge

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