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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA**

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MARY MAUREEN MINSHEW,

Plaintiff,

CASE NO.: 2:10-CV-01593-PMP-PAL

v.

THE HONORABLE MICHAEL B. DONLEY,  
SECRETARY OF THE AIR FORCE,  
GEORGE SALTON, COL. KURT BERGO,  
THE UNITED STATES DEPARTMENT OF  
THE AIR FORCE AND ALPHA-OMEGA  
CHANGE ENGINEERING, A VIRGINIA  
CORPORATION,

Defendants.

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**PLAINTIFF'S MOTION TO FILE  
MOTION FOR PARTIAL SUMMARY  
JUDGMENT UNDER SEAL**

**PLAINTIFF'S MOTION TO FILE**

**MOTION FOR PARTIAL SUMMARY JUDGMENT UNDER SEAL**

For the reasons explained below, Plaintiff, Mary Maureen Minshew moves for an order approving the filing under seal of her Motion for Partial Summary Judgment (#114) and Appendix of Exhibits "A"-“V” in Support of Plaintiff’s Motion (#115). On March 11, 2011, the Court approved the Parties’ Consent Protective Order (#66). Pursuant to said Order, all discovery exchanged in this case is presumed to be confidential and the materials supporting the Plaintiff’s Motion is likewise within the scope of the Court’s Order. As this is a dispositive Motion on some of the issues presented, the Plaintiff concedes that sealing the Motion may not comport with the Ninth Circuit’s direction in *Kamakana v. City and County of Honolulu*, 447 F.3d 1172 (9<sup>th</sup> Cir. 2006). However in light of the Consent Protective Order in place, the Plaintiff respectfully submits this Motion out of an abundance of caution.

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For these reasons, the Plaintiff brings the present motion and submits that there is good cause to submit this request that the Court to issue an order to seal her Motion for Partial Summary Judgment (#114) and Appendix of Exhibits "A"-“V” in Support of Plaintiff’s Motion (#115).

Dated this 27<sup>th</sup> day of February, 2012.

MARY MAUREEN MINSHEW, Plaintiff,

/s/ Kelly R. Dahl, Esq.

By: \_\_\_\_\_

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/s/ Deborah L. Elsasser, Esq.

By: \_\_\_\_\_

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of THORNDAL, ARMSTRONG, DELK,

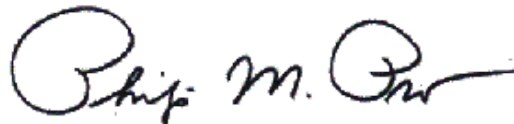
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**IT IS SO ORDERED.**



UNITED STATES DISTRICT JUDGE

**DATED:** March 15, 2012