4447–4503, FTC-CLK-5085–5111.)

Pursuant to Local Rule 10-5(b) and the Amended Confidentiality and Protective Order in this case (ECF No. 308), AMG Services, Inc. moves to file under seal the bank statements of Kellye Sliger, attached as Exhibit H to AMG's March 27, 2013 *Motion to Compel Discovery Responses and Unredacted Documents from the FTC* ("Motion to Compel") (ECF No. 360) and the bank statements of Jennifer Adelman, Walter Archer, Betty Turner, and Lejone Morris, attached as Exhibit G to AMG's Motion to Compel. AMG further moves to file a version of its Motion to Compel that redacts confidential information. The reasons for this motion are as follows:

- 1. On January 15, 2013, the FTC produced documents containing the redacted bank statements of Jennifer Adelman, Walter Archer, Betty Turner, and Lejone Morris. The FTC designated some of these statements "Confidential" (Bates ranges FTC-CLK-3813–14, FTC-CLK-4009–11, FTC-CLK-4017, FTC-CLK-4022–25, FTC-CLK-4551–50, FTC-CLK-5075, FTC-CLK-5077). Other documents containing the same bank statements were not marked "Confidential." (Bates ranges FTC-CLK-3752–55, FTC-CLK-3763–66, FTC-CLK-3774–82,
- 2. Also on January 15, 2013, the FTC produced the bank statements of declarant Kellye Sliger with the bank line items unredacted (Bates range FTC-CLK-4177–89). These statements were marked "Confidential."

FTC-CLK-3784-87, FTC-CLK-3795-98, FTC-CLK-3806-12, CLK 3984-4004, FTC-CLK-

3. On March 27, 2013, AMG filed its Motion to Compel. Exhibit G to the Motion to Compel contains samples of Ms. Adelman's, Mr. Archer's, Ms. Turner's, and Ms. Morris's bank statements. Some of these statements had been marked "Confidential" by the FTC; others had not. Exhibit H to the Motion to Compel contains Ms. Sliger's bank statements, all of which are

marked "Confidential." The Motion to Compel also showed specific line items from Ms. Sliger's bank statement.

- 4. The parties' Amended Confidentiality and Protective Order permits parties to "designate material as 'Confidential'" if it contains confidential financial information. (ECF No. 308 at 1–2.) A party who files information designated "Confidential" with the Court must "seek to file the Confidential Information under seal." (*Id.* at 5.)
- 5. On March 26, 2013, the parties conferred about Ms. Sliger's bank statement, and the FTC requested that it be filed under seal. (Meltzer Decl. ¶ 10, ECF No. 360-1.) Based on this request, AMG also redacted the portion of its Motion to Compel that quotes Ms. Sliger's bank statement.

Accordingly, based the FTC's requests and the controlling protective order in this case, AMG respectfully asks the Court to grant its motion to file Exhibits G and H under seal. AMG also asks the Court to permit it to redact from its Motion to Compel quoted information taken from Exhibit H.

1	Dated: March 27, 2013
2	
3	/s/ Matthew S. Meltzer MATTHEW S. MELTZER
4	KIRKLAND & ELLIS LLP 300 North LaSalle
5	Chicago IL 60654 Telephone: (312) 862-2000
6	Facsimile: (312) 862-2200 Email: matthew.meltzer@kirkland.com
7	Attorney for Defendants AMG Services, Inc.
8	and MNE Services, Inc. (dba Tribal Financial Services, Ameriloan, UnitedCashLoans,
9	USFastCash)
10	
11	
12	IT IS SO ORDERED:
13	Contract
14	UNITED STATES MAGISTRATE JUDGE DATED: <u>4-4-2013</u>
15	
16	
17	
18	
19	
20	
21	
22	
23	
24	
25	
26	
20 27	
41	

4

CERTIFICATE OF SERVICE

Pursuant to Federal Rule of Civil Procedure 5(b), I hereby certify that on the 27th day of March, 2013, I submitted the foregoing *Motion to File Documents Under Seal* electronically for filing and service with the United States District Court of Nevada. Service of the foregoing document shall be made to all counsel of record via electronic case filing.

/s/ Bradley H. Weidenhammer