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 8 *Services, Ameriloan, UnitedCashLoans,*
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**UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA**

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

AMG SERVICES, INC., *ET AL.*,

Defendants, and

PARK 269 LLC, *ET AL.*,

Relief Defendants.

Case No.: 2:12-CV-536-GMN-(VCF)

**MOTION TO FILE DOCUMENTS
 UNDER SEAL**

1 Pursuant to Local Rule 10-5(b) and the Amended Confidentiality and Protective
2 Order in this case (ECF No. 308), AMG Services, Inc., MNE Services, Inc., Red Cedar
3 Services, Inc., and SFS, Inc. (the “Tribal Defendants”) move to file under seal the following
4 documents related to the *Defendants’ Motion for Summary Judgment on Count III*:

- 5 • Exhibit A-1 to Natalie Dempsey’s declaration (Ex. A to the declaration of
6 Bradley Weidenhammer), the Loan Agreements related to an October 12,
7 2011 loan from US Fast Cash taken by Eric Barboza (produced at Bates Nos.
8 AMG_00423420–24), attached hereto as Exhibit 1.
- 9 • Exhibit A-2 to Ms. Dempsey’s declaration, an April 10, 2012 AMG training
10 manual entitled *Loan Application Process and Payment Options* (produced at
11 Bates Nos. AMG_00003640–97), attached hereto as Exhibit 2.
- 12 • Exhibit B to Bradley Weidenhammer’s declaration, the transcript of Natalie
13 Dempsey’s deposition taken on August 7, 2013, attached hereto as Exhibit 3.
- 14 • Exhibit C to Mr. Weidenhammer’s declaration, the *Plaintiff’s Consolidated*
15 *Responses to Defendant AMG Services Inc.’s First and Second Sets of*
16 *Interrogatories* dated June 25, 2013, attached hereto as Exhibit 4.
- 17 • Exhibit G to Mr. Weidenhammer’s declaration, a copy of Natalie Dempsey’s
18 declaration, ECF No. 70-4, dated May 4, 2012 and filed under seal, attached
19 hereto as Exhibit 5.
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23 The reasons for this motion are as follows:

24 1. Pursuant to the Amended Confidentiality and Protective Order in this case “[a]
25 party filing Confidential Information with the Court, and any pleadings, motions or other papers
26 filed with the Court disclosing Confidential Information must comply with Local Rule 10-5(b)
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1 and seek to file the Confidential Information under seal as follows: for Confidential Information
2 attached to or included in dispositive motions, the moving party(ies) must articulate compelling
3 reasons supported by specific facts demonstrating that sealing the document outweighs the
4 public's interest in disclosure" (ECF No. 308, at 5.)
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6 2. Exhibit A-1 to Natalie Dempsey's declaration, the Loan Agreements related to an
7 October 12, 2011 loan from US Fast Cash taken by Eric Barboza (produced at Bates Nos.
8 AMG_00423420-24), were marked "Confidential" by AMG and contain both Mr. Barboza's
9 confidential personal information as well as the defendants' confidential commercial
10 information, the disclosure of which would cause harm to the Tribal Defendants' businesses.

11 3. Exhibit A-2 to Ms. Dempsey's declaration, an April 10, 2012 AMG training
12 manual entitled Loan Application Process and Payment Options (produced at Bates Nos.
13 AMG_00003640-97) was marked "Confidential" by AMG and contains confidential commercial
14 information, the disclosure of which would cause harm to the Tribal Defendants' businesses.
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16 4. Exhibit B to the declaration of Bradley Weidenhammer, the transcript of Natalie
17 Dempsey's deposition taken on August 7, 2013, was marked "Confidential" by AMG and
18 contains confidential commercial information, the disclosure of which would cause harm to the
19 Tribal Defendants' businesses.
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21 5. Exhibit C to Mr. Weidenhammer's declaration, the *Plaintiff's Consolidated*
22 *Responses to Defendant AMG Services Inc.'s First and Second Sets of Interrogatories* dated June
23 25, 2013, contains confidential commercial information, the disclosure of which would cause
24 harm to the Tribal Defendants' businesses.

25 6. Exhibit G to Mr. Weidenhammer's declaration, a copy of Natalie Dempsey's
26 declaration, ECF No. 70-4, dated May 4, 2012 was originally filed under seal because it contains
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1 confidential commercial information, the disclosure of which would cause harm to the Tribal
2 Defendants' businesses.

3 7. The personal privacy and commercial concerns related to disclosure of the above-
4 described documents constitute compelling reasons for maintaining the confidentiality of these
5 documents.
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8 Accordingly, the Tribal Defendants respectfully ask the Court to grant their motion to
9 file Exhibits A-1, A-2, B, C, and G under seal.

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11 Dated: September 30, 2013

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13 */s/ Bradley H. Weidenhammer*
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22 *and MNE Services, Inc. (dba Tribal Financial*
23 *Services, Ameriloan, UnitedCashLoans,*
24 *USFastCash)*

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IT IS SO ORDERED:



UNITED STATES MAGISTRATE JUDGE
DATED: 10-1-2013

CERTIFICATE OF SERVICE

Pursuant to Federal Rule of Civil Procedure 5(b), I hereby certify that on the 30th day of September 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

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