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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

THE PHOENIX INSURANCE COMPANY,  
TRAVELERSPROPERTY CASUALTY  
COMPANY OF AMERICA,

Plaintiff.

v.

YOUR VITAMINS, INC., d/b/a PROCAPS  
LABORATORIES, and ANDREW LESSMAN,

Defendants,

YOUR VITAMINS, INC., d/b/a PROCAPS  
LABORATORIES, and ANDREW LESSMAN,

Counterclaimants,

v.

THE PHOENIX INSURANCE COMPANY,  
TRAVELERSPROPERTY CASUALTY  
COMPANY OF AMERICA,

Counterdefendants.

No.: 2:12-cv-00564-MMD-RJJ

**DEFENDANTS'/COUNTERCLAIMANTS'  
MOTION FOR LEAVE TO FILE UNDER  
SEAL A LIMITED NUMBER OF  
EXHIBITS SUBMITTED IN  
CONNECTION WITH: (1) REPLY TO  
TRAVELERS' RESPONSE TO MOTION  
TO COMPEL AND (2) REPLY TO  
TRAVELERS' RESPONSE TO  
COUNTERMOTION FOR SUMMARY  
JUDGMENT**

1 Your Vitamins, Inc., d/b/a ProCaps Laboratories, and Andrew Lessman (collectively,  
2 “Defendants”), by and through their attorneys of Santoro Whitmire, hereby file  
3 Defendants’/Counterclaimants’ Motion For Leave to File Under Seal a Limited Number of  
4 Exhibits Submitted in Connection with (1) Reply to Travelers’ Response to Motion to Compel  
5 and (2) Reply to Travelers’ Response to Countermotion for Summary Judgment. In support  
6 thereof, Defendants state as follows:

7 1. On November 30, 2012, Defendants/Counterclaimants filed a redacted version of  
8 Defendants/Counterclaimants’ Reply to Plaintiffs’ Response to Motion to Compel Production of  
9 Documents and Responses to Interrogatories [Dkt. 62].

10 2. On November 30, 2012, Defendants/Counterclaimants filed a redacted version of  
11 Defendants/Counterclaimants’ Reply to Plaintiffs’ Response to Countermotion for Partial  
12 Summary Judgment [Dkt. 63].

13 3. Defendants seek to file under seal a limited number of exhibits to each of the  
14 foregoing filings.

15 4. The redacted materials relate to documents that are sensitive in nature, that may  
16 contain confidential information and which is appropriately protected from disclosure by the  
17 Protective Order in this case.

18 5. This Motion seeks permission to file the un-redacted exhibits to the motions:

- 19
- 20 • Exs. C-E to the Reply [Dkt. 62] relating to the Motion to Compel
  - 21 • Ex. A to the Reply [Dkt. 63] relating to the Countermotion for Partial  
22 Summary Judgment

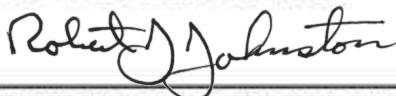
23 Dated this 30th day of November, 2012.

**SANTORO WHITMIRE**

*/s/ James E. Whitmire*  
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*Attorneys for Defendants/Counterclaimants*

**IT IS SO ORDERED.**



**UNITED STATES MAGISTRATE JUDGE**

**DATED:** December 3, 2012