

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

TARGET CORPORATION et al.,

Plaintiffs,

v.

VISA INC. et al.,

Defendants.

7-ELEVEN, INC. et al.,

Plaintiffs,

v.

VISA INC. et al.,

Defendants.

*So order*  
*11-21-24*  
*Alvin K. Hellerstein*  
Case No. 13 Civ. 3477 (AKH)

Case No. 13 Civ. 4442 (AKH)

**PLAINTIFFS' NOTICE OF MOTION FOR LEAVE TO FILE UNDER SEAL  
MATERIALS IN CONNECTION WITH PLAINTIFFS'  
MEMORANDUM IN OPPOSITION TO DEFENDANTS' MOTION  
FOR A REVISED SUMMARY JUDGMENT RULING UNDER FRCP 54(B)**

PLEASE TAKE NOTICE THAT, pursuant to Rule 4(B)(i) of this Court's Individual Rules, Plaintiffs in the above-captioned actions respectfully move this court, before the Honorable Alvin K. Hellerstein, United States District Judge, in Courtroom 14D of the Daniel Patrick Moynihan United States Courthouse, located at 500 Pearl Street, New York, New York 10007, at a date and time to be determined by the Court, for leave to file under seal unredacted versions of the following:

- Plaintiffs' Opposition to Defendants' Motion for a Revised Summary Judgment Ruling Under Federal Rule of Civil Procedure 54(b);

- Exhibits 1 and 2 to the Transmittal Declarations of James A. Wilson and Jeffrey I. Shinder in Support of Plaintiffs' Opposition to Defendants' Motion for a Revised Summary Judgment Ruling Under Federal Rule of Civil Procedure 54(b).

Thus, pursuant to Rule 4(B)(i) of this Court's Individual Rules, Plaintiffs are contemporaneously with this motion (i) filing on ECF partially redacted copies of the above-listed documents, as described in the accompanying memorandum of law in support of this motion; (ii) submitting unredacted copies of these materials to the Court; and (iii) serving unredacted copies on counsel for Defendants.

The grounds for this motion are set forth in the accompanying memorandum of law.

Respectfully submitted,

Dated: September 4, 2024

**CONSTANTINE CANNON LLP**

**VORYS, SATER, SEYMOUR AND  
PEASE LLP**

*/s/ Jeffrey I. Shinder*

*/s/ James A. Wilson*

Jeffrey I. Shinder  
Matthew L. Cantor  
A. Owen Glist  
Ankur Kapoor  
Taline Sahakian  
David A. Scupp  
6 East 43rd Street, 26th Floor  
New York, NY 10017  
(212) 350-2700  
jshinder@constantinecannon.com

James A. Wilson  
Robert N. Webner  
Douglas R. Matthews  
Kimberly Weber Herlihy  
Alycia N. Broz  
Kenneth J. Rubin  
52 East Gay Street  
Columbus, OH 43215  
(614) 464-6400  
jawilson@vorys.com

*Attorneys for 7-Eleven Plaintiffs*

**GIBBS & BRUNS LLP**

Kathy D. Patrick  
Barrett Reasoner  
Jorge Gutierrez  
Nick Beachy  
Shannon N. Smith  
Erica Krennerich

1100 Louisiana Street, Suite 5300  
Houston, Texas 77002  
(713) 650-8805  
kpatrick@gibbsbruns.com

*Attorneys for Target Plaintiffs*