

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

So order
11-21-24
Alvin K. Hellerstein

TARGET CORPORATION et al.,

Plaintiffs,

v.

VISA INC. et al.,

Defendants.

Case No. 13 Civ. 3477 (AKH)

7-ELEVEN, INC. et al.,

Plaintiffs,

v.

VISA INC. et al.,

Defendants.

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