

MEMO ENDORSED

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

BALCHEM CORPORATION and ALBION
LABORATORIES, INC.,

Plaintiffs,

v.

DANIEL TODD EDWARDS and MIL
AGRO, INC.,

Defendants.

**Civil Action No.: 7:18-CV-02677-KMK-
JCM**

DEFENDANTS' MOTION TO FILE UNDER SEAL

Defendants move for leave to file an unredacted version of Defendants' Reply in Support of their Motion for Summary Judgment on: 1) Trade Secret Claims; 2) Breach of Contract Claims; 3) Fraudulent Inducement Claims; and 4) False Advertising Claims ("Defendants' Reply") and Exhibits 123–128, 130–132.

A redacted version of Defendants' Reply was filed via ECF on March 13, 2020 (ECF No. 185.) This reply contains deposition testimony, excerpts from expert reports, other information Plaintiffs consider to be trade secrets, and other highly confidential information. Pursuant to Section 14 of the Protective Order (ECF No. 52), Defendants seek leave to file the unredacted copies of the above listed documents, and their exhibits, under seal in order to preserve the confidentiality of the information contained therein.

Accordingly, the Defendants respectfully request leave to file the above referenced document (ECF No. 185) under seal.

Dated: March 13, 2020

DANIEL TODD EDWARDS and MIL
AGRO, INC

By: /s/ C.J. Veverka

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Granted

So ordered

A MK
3/14/20