

**MEMO ENDORSED**

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

GREGORY MARONEY AND HENRY H.  
HEUMANN, individually and on behalf of  
all others similarly situated,

Plaintiffs,

v.

WOODSTREAM CORPORATION,

Defendant.

CASE NO. 7:19-CV-08294-KMK

Honorable Kenneth M. Karas

**DEFENDANT WOODSTREAM CORPORATION'S NOTICE OF RESPONSE AND  
RESPONSE IN SUPPORT OF MAINTAINING CERTAIN DOCUMENTS UNDER  
SEAL**

**PLEASE TAKE NOTICE** that Defendant Woodstream Corporation (“Woodstream”) has filed the instant Response in Support of Maintaining Certain Documents under Seal as initially requested by Plaintiffs in their Motion to File Provisionally Under Seal in Support of Motion for Class Certification (Dkt. 113, “Motion to Seal”). This Notice is pursuant to Local Rule 7.1(b), which requires notice for oppositions that “seek[] relief that goes beyond the denial of the motion.” Here, Woodstream’s Response does not seek denial of Plaintiffs’ motion to seal. Instead, for the reasons set forth in Woodstream’s concurrently filed memorandum and declaration, Woodstream requests the Court *grant* Plaintiffs’ Motion to Seal, and permanently maintain Woodstream’s confidential information and documents under seal, specifically:

1. Exhibit 20 to the Declaration of Timothy Blood in Support of Plaintiffs’ Motion for Class Certification (Dkt. 115-1).
2. Redacted portions of Plaintiffs’ Reply Brief in Support of Motion for Class Certification (Dkt. 114).<sup>1</sup>

This Response in Support of Maintaining Certain Documents Under Seal, and included request for relief, is based on: (1) Woodstream’s accompanying Memorandum in Support and the Declaration of Ashley Brown; (2) Plaintiffs’ Motion to Seal (Dkt. 113), Sealed Reply Brief in Support of Motion for Class Certification (Dkt. 114), and Sealed Declaration of Timothy Blood in Support of Reply Class Certification (Dkt. 115); and (3) the Court’s prior order granting Motion to Seal (Dkt. 101).

DATED: October 16, 2024

Respectfully submitted,

/s/ Robyn E Bladow

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<sup>1</sup> Plaintiffs also move to seal certain portions of their reply brief on page 4 that contain information this Court previously ordered to remain under seal. (Dkt. 101). The parties agree that this information should continue to remain under seal and be redacted in Plaintiffs’ reply brief.

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Defendant's request is granted. The Court notes that Plaintiffs do not oppose the request. The following documents and information should be maintained under seal: (1) Exhibit 20 to the Declaration of Timothy Blood in Support of Plaintiffs' Motion for Class Certification (Dkt. No. 115-1); (2) redacted portions of Plaintiffs' Reply Brief in Support of Motion for Class Certification (Dkt. No. 114) that reference or quote from Woodstream's confidential documents.

SO ORDERED.

A handwritten signature in black ink, appearing to be 'J. P. Lefkowitz', written over a horizontal line.

10/24/2024