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Kevin H. Sharp

IN THE UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF TENNESSEE AT NASHVILLE

LISA MOORE, )
FTP Plaintiff, )
v. ) Civil Action
) File No. 3:12-CV-0359
ANTHEM LIFE INSURANCE )
COMPANY, )
Defendant. )

MOTION FOR PERMISSION TO FILE PORTION OF ADMINISTRATIVE RECORD UNDER SEAL

Defendant Anthem Life Insurance Company ("Anthem"), pursuant to Section 5.7 of the United States District Court for the Middle District of Tennessee's Administrative Order No. 167 regarding Administrative Practices and Procedures for Electronic Case Filing, respectfully moves this Court for the entry of an Order allowing it to file a portion of the Administrative Record (Moore-Claims Documents-1-238) (the "Claims Documents") (attached hereto as Exhibit A) under seal. As grounds, Anthem states as follows:

1. Pursuant to Section 5(c) of the Case Management Order [D. 11], Anthem is required to "file the Administrative Record with Court and serve a copy of same on Plaintiff no later than August 31, 2012." The Administrative Record is comprised of the Claims Documents (which contain confidential information and personal identifiers regarding Plaintiff) and the Governing Plan Documents (Moore-Plan Documents-1-85) (which do not contain confidential information).

2. The Claims Documents contain confidential medical records and protected health information. Pursuant to federal privacy laws, Anthem does not share such information with the