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THE HONORABLE RICARDO S. MARTINEZ

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE**

GINA KIM, on behalf of a class consisting of herself and all other persons similarly situated,	)	Cause No. 2:11-CV-00214 RSM
	)	
Plaintiffs,	)	<b>PLAINTIFF’S OPPOSITION TO COACH, INC.’S MOTION TO SEAL</b>
vs.	)	<b>NOTED FOR CONSIDERATION APRIL 8, 2011</b>
COACH, INC., a Maryland corporation, and COACH SERVICES, INC., a Maryland corporation,	)	
	)	
Defendants.	)	

Cause No. 2:11-CV-00214 RSM  
PLAINTIFF’S OPPOSITION TO COACH,  
INC.’S MOTION TO SEAL - 1

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1 On March 28, 2011, Coach filed its opposition to counterclaim defendant's anti-SLAPP  
2 Motion to Strike. In its accompanying Motion to Seal, Coach requests that this Court grant it  
3 leave to seal its entire legal brief, and the entire supporting declaration of John Macaluso, with  
4 all attached exhibits.

5 Coach's request to seal every single word of its opposition brief and every single word of  
6 supporting evidentiary materials is grossly overbroad and not in compliance with LR 5(g). LR  
7 5(g)(3) provides that "The Court will allow parties to file entire memoranda under seal only in  
8 rare circumstances." It also provides that "[i]f possible, a party should protect sensitive  
9 information by redacting documents rather than seeking to file them under seal." LR 5(g).

10 There are no "rare circumstances" here. In its SLAPP defamation suit, Coach sued  
11 opposing counsel for in public, for all to see. Now that Coach has been called to account in an  
12 anti-SLAPP proceeding, it seeks to keep secret every word of its explanation for this conduct.  
13 Coach has made no showing as to why its legal arguments, discussing case law, should be  
14 sealed. Coach has made no showing as to why written statements received from third parties,  
15 which are obviously not confidential, should be sealed. Coach has made no showing as to why  
16 its allegations against opposing counsel, which it has included in at least two public filings,  
17 should now be sealed.

18 We respectfully request that the Court deny Coach's overbroad request to seal their entire  
19 filing, and direct Coach to submit a redacted public filing, allowing Coach to file under seal only  
20 those matters which are truly appropriate for filing under seal.

21 DATED this \_\_\_\_\_ day of March, 2010.

22 /s/

23 \_\_\_\_\_  
24 Christopher Carney, WSBA No. 30325  
25 Carney Gillespie Isitt PLLP  
26 Jay S. Carlson, WSBA No. 30411  
27 Carlson Legal Jason Moore  
28 Van Eyk & Moore, PLLC  
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27 Cause No. 2:11-CV-00214 RSM  
28 REPLY IN SUPPORT OF MOTION TO  
STRIKE AND FOR SANCTIONS - 2

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