

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

BROCK STONE, et al. )  
 )  
 Plaintiffs, )  
 v. ) Case No. 17-cv-02459  
 )  
 DONALD J. TRUMP, et al. )  
 )  
 Defendants. )  
 )  
 \_\_\_\_\_ )

**PLAINTIFFS’ CONSENT MOTION TO FILE UNDER SEAL SUPPLEMENTAL  
DECLARATIONS OF PLAINTIFFS COLE, GILBERT, AND STONE, AND AN  
EXHIBIT ATTACHED TO PLAINTIFF GEORGE’S SUPPLEMENTAL  
DECLARATION**

Pursuant to Local Rule 105.11, Plaintiffs respectfully move the Court to place under seal the Supplemental Declarations of Plaintiffs Kate Cole, Teagan Gilbert, and Brock Stone in Support of Plaintiffs’ Reply, and the Exhibit attached to the Supplemental Declaration of Plaintiff Seven Ero George, which Plaintiffs have filed contemporaneously with this Motion. Plaintiffs have filed redacted versions of these documents on the public record.

Local Rule 105.11 provides that courts may grant motions to seal if the moving party includes “(a) proposed reasons supported by specific factual representations to justify the sealing and (b) an explanation why alternatives to sealing would not provide sufficient protection.”

Sealing is appropriate here. The Exhibit attached to the Supplemental Declaration of Seven Ero George in Support of Plaintiffs’ Reply contains personally identifiable information, Plaintiff George’s home address, and other personal information. Unless this Exhibit is placed under seal, Plaintiff and his family will be at risk for retaliation, harassment, and violence. Further, the Supplemental Declarations of Plaintiffs Kate Cole, Teagan Gilbert, and Brock Stone contain sensitive medical information, the publication of which would harm Plaintiffs’ privacy

interests. Moreover, there are no alternatives other than filing under seal that would allow Plaintiffs to support their Reply while maintaining their privacy. The government has confirmed that it consents to this motion.

Pursuant to Local Rule 105.11, if the Court denies this Motion, Plaintiffs reserve their right to withdraw the above mentioned filings from the docket and secure prompt return of all such materials served upon Defendants. In the interim, Defendants and their counsel should not disclose publicly or use outside of this litigation the Exhibit to Plaintiff George's Supplemental Declaration or the Supplemental Declarations of Plaintiffs Kate Cole, Teagan Gilbert, and Brock Stone.

For the above stated reasons, Plaintiffs respectfully request that the Court enter an order sealing the Supplemental Declarations of Plaintiffs Kate Cole, Teagan Gilbert, and Brock Stone, and the Exhibit to Plaintiff Seven Ero George's Supplemental Declaration. A proposed order is attached.

Dated: October 27, 2017

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Respectfully submitted,



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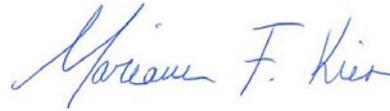
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**CERTIFICATE OF SERVICE**

I hereby certify that on this 27th day of October, 2017, copies of the foregoing and any exhibits were served via CM/ECF on all counsel of record.

A handwritten signature in blue ink that reads "Marianne F. Kies". The signature is written in a cursive style with a horizontal line underneath it.

Marianne F. Kies

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**[Proposed] ORDER SEALING PORTIONS OF THE COURT RECORD**

Whereas, on October 27, 2017, Plaintiffs filed a Motion to Seal (the “Motion”);

Whereas, in the Motion, Plaintiffs have proposed reasons supported by specific factual representations to justify the [requested] sealing, in accordance with L.R. 105.11;

Whereas, Defendants have identified the following portion of the record as that portion which is subject to the Motion: (1) the Exhibit attached to the Supplemental Declaration of Plaintiff Seven Ero George in Support of Plaintiffs’ Reply; and (2) the Supplemental Declarations of Plaintiffs Kate Cole, Teagan Gilbert, and Brock Stone in their entirety (hereafter, the “Sealed Exhibits”);

Whereas, the Court has considered the Motion and any opposition thereto;

Whereas, Defendants do not oppose the Motion;

Whereas, the Court has not ruled on the Motion for at least fourteen (14) days after it was entered on the public Court docket to permit the filing of objections by interested parties;

Whereas, the Court has considered any objections by interested parties, pursuant to L.R. 105.11;

Whereas, Plaintiffs have stated in the Motion why alternatives to sealing would not provide sufficient protection;

Whereas, the Court finds and holds that alternatives to sealing would not provide sufficient protection;

Whereas, the Court finds and holds that sealing of a portion of the record, specified herein, is appropriate;

Accordingly, it is this \_\_\_\_ day of \_\_\_\_\_ 2017 by the United States District Court for the District of Maryland, ORDERED:

1. That Plaintiffs' Motion to Seal be, and the same hereby is, GRANTED, as specifically set forth herein;
2. That the Sealed Exhibits (as defined above) be, and the same hereby are, PLACED UNDER SEAL by the Clerk of the Court and that the Sealed Records shall be placed in an envelope or other container which is marked SEALED, SUBJECT TO ORDER OF COURT DATED \_\_\_\_\_.
3. A copy of this Order shall be mailed to all counsel of record and to any other person entitled to notice hereof, and shall be docketed in the Court file.
4. No party or their counsel shall make public or otherwise disclose any of the Sealed Records to any person or entity not directly associated with this litigation.

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UNITED STATES DISTRICT JUDGE