

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

RICHARD ROE, ET AL.,

PLAINTIFFS,

v.

MARK T. ESPER, ET AL.,

DEFENDANTS.

CIVIL ACTION NO. 1:18-cv-01565

**MOTION TO SEAL PLAINTIFFS' REPLY AND EXHIBITS A AND B
IN SUPPORT OF THEIR MOTION TO MODIFY THE COURT'S SCHEDULING
ORDER FOR THE LIMITED PURPOSE OF TAKING A DEPOSITION OUT OF TIME**

Pursuant to Local Civil Rule 5, Plaintiffs respectfully move this Court for permission to file under seal unredacted versions of their Reply in Support of Their Motion to Modify the Court's Scheduling Order for the Limited Purpose of Taking the Deposition of Colonel Danaher Out of Time, and Exhibits A and B to that motion, along with redacted version on the public record. These documents contain confidential discussions of officials of the Air Force, and are subject to the Court's protective order in this case, which requires that the information contained in them be redacted from documents filed on the public record. For these reasons, which are elaborated upon in the accompanying Memorandum in Support, these documents must be filed under seal, along with redacted versions filed on the public record.

Dated: July 11, 2019

/s/ Scott Schoettes

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CERTIFICATE OF SERVICE

I certify that, on the 11th day of July, 2019, I caused this document to be filed electronically through the Court's CM/ECF system, which automatically sent a notice of electronic filing to all counsel of record.

Dated: July 11, 2019

Respectfully submitted,

/s/ John W. H. Harding

John W.H. Harding

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PROPOSED ORDER

Upon consideration of Plaintiffs' Motion to Seal Their Reply and Exhibits A and B in Support of Their Motion to Modify the Court's Scheduling Order for the Limited Purpose of Taking the Deposition of Colonel Danaher Out of Time, this Court GRANTS the motion, FINDING that: (1) Plaintiffs provided sufficient notice of the request; (2) that there are no less drastic alternatives than filing these documents under seal along with publicly filed redacted versions; and (3) that there is good cause to keep these documents under seal because they are subject to the Court's protective order in this case. Therefore, it is hereby:

ORDERED that the unredacted versions of Plaintiffs' Reply in Support of Their Motion to Modify the Court's Scheduling Order for the Limited Purpose of Taking the Deposition of Colonel Danaher Out of Time, and Exhibits A and B to that motion, may remain filed under seal.

Entered this ____ day of _____, 2019.

United States District Judge