

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO**

STACIE RAY,)	
<i>et al.</i> ,)	
)	
Plaintiffs,)	Case No. 2:18-cv-00272
)	
v.)	
)	
AMY ACTON,)	Judge: Michael Watson
<i>et al.</i> ,)	
)	Magistrate Judge: Chelsey Vascura
Defendants.)	
)	

**JOINT MOTION TO FILE SINGLE COPIES OF DEPOSITION TRANSCRIPTS
AND TO FILE CERTAIN TRANSCRIPTS AND MOTIONS UNDER SEAL**

The parties are briefing cross-motions for summary judgment to be filed on or before January 16, 2019. The parties have consulted regarding record citations for their motions and respectfully make the following requests of the Court.

First, Judge Watson’s standing orders require parties to file entire deposition transcripts if they cite to any part of a deposition in their motions. There are eight deposition transcripts in this case: Plaintiffs Stacie Ray, Jane Doe, Basil Argento, and Ashley Breda; Defendant Ohio Department of Health’s 30(b)(6) witness Judith Nagy; and expert witnesses Randi Ettner, R. Nicholas Gorton, and Quentin Van Meter. To avoid redundancy, the parties respectfully propose to file only one copy of each transcript in total. Plaintiffs propose to file the Plaintiffs’ transcripts, and Defendants propose to file the Defendant’s and expert witnesses’ transcripts.

Second, the record in this case is subject to two protective orders: an order protecting the identity of Plaintiff Jane Doe (ECF No. 9) and a Joint Stipulated Protective Order protecting confidential and attorney’s eyes only sensitive information (ECF No. 34). Portions of each of the Plaintiffs’ transcripts have been designated confidential or attorney’s eyes only under ECF No. 34,

and as to Jane Doe's deposition transcript, additional portions contain identifying information under ECF No. 9. Pursuant to these protective orders and to Local Rule 5.2.1(a), the parties respectfully request leave to file the Plaintiffs' deposition transcripts under seal, and file copies with confidential, identifying, or attorney's eyes only information redacted on the public docket. Because portions of each cross-motion for summary judgment will necessarily cite to redacted portions of the deposition transcripts, the parties also request leave to file their respective motions for summary judgment under seal, with redacted versions filed on the public docket.

A proposed order is attached hereto.

Dated January 7, 2020

/s/ Jason J. Blake

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CERTIFICATE OF SERVICE

I certify that on January 7, 2020, I filed the foregoing electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Elizabeth Bonham
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[PROPOSED] ORDER GRANTING LEAVE TO FILE UNDER SEAL

On the Parties' Joint Motion and for good cause shown, it is hereby ORDERED:

1. Neither party is required to file every deposition transcript; Defendants will file the transcripts of Judith Nagy, Randi Ettner, R. Nicholas Gorton, and Quentin Van Meter, and Plaintiffs will file the transcripts of each Plaintiff;
2. The Plaintiffs' transcripts will be filed under seal and versions with confidential, identifying, or attorney's eyes only information redacted will be filed on the public docket; and
3. To the extent that the parties' summary judgment briefing cites to redacted portions of the deposition transcripts, that briefing will be filed under seal and redacted versions will be filed on the public docket.

IT IS SO ORDERED.

United States District Judge

Dated: January ____, 2020