

The Honorable Marsha J. Pechman

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

RYAN KARNOSKI, et al.,

Plaintiffs, and

STATE OF WASHINGTON,

Plaintiff-Intervenor,

v.

DONALD J. TRUMP, in his official capacity
as President of the United States, et al.,

Defendants.

Case No. 2:17-cv-01297-MJP

PLAINTIFFS’ MOTION TO SEAL

NOTE ON MOTION CALENDAR:
July 17, 2020

1 Pursuant to Local Civil Rule 5(g), plaintiffs Ryan Karnoski, Staff Sergeant Cathrine
2 Schmid, D.L., Chief Warrant Officer Lindsey Muller, Petty Officer First Class Terece Lewis,
3 Petty Officer Second Class Phillip Stephens, Petty Officer Second Class Megan Winters, Jane
4 Doe, Human Rights Campaign, Gender Justice League, and American Military Partners
5 Association n/k/a Modern Military Association of America (collectively “Plaintiffs”) hereby
6 respectfully move the Court for an Order permitting them to file in redacted form Plaintiffs’
7 Response to the Court’s Questions in its June 24, 2020 Order (the “Response”) and to file under
8 seal Exhibits 9 and 16–21 (the “Exhibits”),¹ all of which contain information that is designated
9 confidential under the protective order in this case.

10 Pursuant to Rule 5(g)(2), Plaintiffs have filed the Response and Exhibits under seal after or
11 contemporaneously with this Motion, and respectfully request that the Court, in its discretion,
12 allow the Response and Exhibits to remain as filed.

13 Plaintiffs certify that, pursuant to Rule 5(g)(3), Jordan Heinz, counsel for Plaintiffs, sent
14 counsel for Defendants an email to inform them of the documents being filed under seal and to
15 request Defendants’ consent to Plaintiffs’ request to file the Response and Exhibits under seal.
16 Counsel for Defendants confirmed that they have no objection to Plaintiffs’ request.

17 ARGUMENT

18 Pursuant to LCR 5(g)(3), Plaintiffs seek to redact certain information in their Response
19 that is quoted from supporting documents that are designated “CONFIDENTIAL” under the
20 Stipulated Uniform Protective Order and Cross-Use Agreement. (Dkt. No. 183.) Plaintiffs also
21 seek to file under seal the underlying documents for the same reason that these are materials
22 Plaintiffs received through discovery that have been designated confidential pursuant to the
23 protective order in this case.

24 CONCLUSION

25 For the foregoing reasons, Plaintiffs respectfully request that they be permitted to file the
26 Response in redacted form and the Exhibits under seal.

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¹ True and correct copies of each of these documents are attached hereto as Exhibits 1 through 7.

1 Respectfully submitted July 1, 2020.

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Counsel for Plaintiffs

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CERTIFICATE OF SERVICE

The undersigned certifies under penalty of perjury under the laws of the United States of America and the laws of the State of Washington that all participants in the case are registered CM/ECF users and that service of the foregoing documents will be accomplished by the CM/ECF system on July 1, 2020.

s/ Rachel Horvitz
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Case No. 2:17-cv-01297-MJP

**[PROPOSED] ORDER GRANTING
PLAINTIFFS' MOTION TO SEAL**

NOTE ON MOTION CALENDAR:
July 17, 2020

This matter comes before the Court on Plaintiffs' Motion to Seal. The Court having considered the Motion, Defendants' Response, and all pleadings and papers on file herein, IT IS HEREBY ORDERED:

1. Plaintiffs' Motion to Seal is hereby GRANTED.
2. Plaintiffs' Response to the Court's Questions in its June 24, 2020 Order shall remain redacted and Exhibits 9 and 16–21 thereto will remain filed under seal.

IT IS SO ORDERED

