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9 UNITED STATES DISTRICT COURT  
10 DISTRICT OF ARIZONA

11 Russell B. Toomey,

12 Plaintiff,

13 v.

14 State of Arizona, *et al.*

15 Defendants.  
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17

No. 4:19-cv-00035

**DEFENDANTS STATE OF  
ARIZONA’S, ANDY TOBIN’S, AND  
PAUL SHANNON’S MOTION FOR  
LEAVE TO FILE EXHIBITS UNDER  
SEAL**

18 Pursuant to Local Rule of Civil Procedure 5.6 and the Stipulated Protective Order  
19 (Doc. 165), Defendants State of Arizona, Andy Tobin, and Paul Shannon (collectively, the  
20 “State Defendants”) hereby move this Court for an order directing the Clerk to file under  
21 seal Exhibits 1 and 7 to the Declaration of Ryan Curtis In Support Of State Defendants’  
22 Objections To Order Compelling Production (the “Declaration”), filed concurrently.  
23 Exhibits 1 and 7 to the Declaration contain confidential and proprietary information that is  
24 protected from public disclosure under the Federal Rules of Civil Procedure and the  
25 Stipulated Protective Order (Doc. 165).

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A proposed Order is appended hereto.

DATED this 12<sup>th</sup> day of July, 2021.

FENNEMORE CRAIG, P.C.

By: s/ Ryan Curtis

Timothy J. Berg

Amy Abdo

Ryan Curtis

Shannon Cohan

Attorneys for Defendants State of

Arizona, Andy Tobin, and Paul

Shannon

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**CERTIFICATE OF SERVICE**

I hereby certify that on July 12, 2021, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing to the following CM/ECF registrants. I further certify that on July 12, 2021, I served a copy of the attached documents, which are lodged under seal, by e-mail on the following:

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11 Russell B. Toomey,  
 12 Plaintiff,  
 13 v.  
 14 State of Arizona, *et al.*  
 15 Defendants.

No. 4:19-cv-00035

**[PROPOSED] ORDER GRANTING  
 DEFENDANTS STATE OF  
 ARIZONA’S, ANDY TOBIN’S, AND  
 PAUL SHANNON’S MOTION FOR  
 LEAVE TO FILE EXHIBITS UNDER  
 SEAL**

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 18 Having reviewed Defendants State of Arizona’s, Andy Tobin’s, and Paul Shannon’s  
 19 Motion For Leave to File Exhibits Under Seal and finding good cause,

20 IT IS ORDERED that the Motion is granted.

21 IT IS FURTHER ORDERED directing the Clerk to file Exhibits 1 and 7 to the  
 22 Declaration of Ryan Curtis under seal.

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