

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

GERALD LYNN BOSTOCK,)	
)	
Plaintiff,)	
)	
v.)	CIVIL ACTION
)	NO: 1:16-cv-01460-ELR-WEJ
CLAYTON COUNTY,)	
)	
Defendant.)	

PLAINTIFF’S MOTION TO FILE UNDER SEAL

Plaintiff pursuant to N.D. Ga. L.R. 79.1, moves to file the following under seal:

1. Plaintiff’s Exhibit 43¹ (which was used, with this same exhibit number, at more than one deposition in this case); and
2. The following lines of the transcript of the deposition of Leslie Moore: 51:18 52:2-13, 53:9-14, 53:16-23, 54:9-12, 55:3-8, and 63:12-17.

These documents or portions thereof were designated as confidential by Defendant as part of the Consent Protective Order in this case. (Doc. 85.) A proposed Order is attached.

¹ Plaintiff has disputed the confidential designation of this document. (Doc. nos. 112, 115, 116, 117.) Because this issue is still pending with the District Court, Plaintiff has moved to file Exhibit 43 under seal.

Respectfully submitted this 21st day of March, 2022

BUCKLEY BEAL, LLP

By: /s/ Edward D. Buckley

Edward D. Buckley

Georgia Bar No. 092750

Thomas J. Mew, IV

Georgia Bar No. 503447

Andrew M. Beal

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BUCKLEY BEAL, LLP

600 Peachtree Street NE

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Counsel for Plaintiff Gerald Bostock

LR 7.1(D) FONT COMPLIANCE CERTIFICATION

The undersigned counsel certifies that the foregoing was prepared using Times New Roman 14-point font in accordance with Local Rule 5.1 of the United States District Court for the Northern District of Georgia.

This 21st day of March 2022.

By: /s/ Edward D. Buckley

Edward D. Buckley

Georgia Bar No. 092750

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FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

GERALD LYNN BOSTOCK,)

Plaintiff,)

v.)

CLAYTON COUNTY,)

Defendant.)

**CIVIL ACTION
NO: 1:16-cv-01460-ELR-WEJ**

CERTIFICATE OF SERVICE

I hereby certify that on the 21st day of March, 2022, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will automatically send email notification of such filing to all counsel of record.

By: */s/ Edward D. Buckley*
Edward D. Buckley
Georgia Bar No. 092750

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Plaintiff,)	
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)	NO: 1:16-cv-01460-ELR-WEJ
CLAYTON COUNTY,)	
)	
Defendant.)	

**PLAINTIFF’S MEMORANDUM IN SUPPORT OF MOTION TO FILE
UNDER SEAL**

Plaintiff has moved to file the following under seal:

1. Plaintiff’s Exhibit 43¹ (which was used, with this same exhibit number, at more than one deposition in this case); and
2. The following lines of the transcript of the deposition of Leslie Moore: 51:18
52:2-13, 53:9-14, 53:16-23, 54:9-12, 55:3-8, and 63:12-17.

The basis for this motion is that these documents contain material that has been designated “Confidential” in writing by Defendant, pursuant to the Consent Protective Order (doc. 85) in this case. Thus, Plaintiff is not the designating party.

¹ Plaintiff has disputed the confidential designation of this document. (Doc. nos. 112, 115, 116, 117.) Because this issue is still pending with the District Court, Plaintiff has moved to file Exhibit 43 under seal.

As Plaintiff understand Defendant's designations, they are that Exhibit 43 and the designated portions of Ms. Moore's deposition transcript contain private and highly sensitive information under the Consent Protective Order.

Respectfully submitted this 21st day of March, 2022.

BUCKLEY BEAL, LLP

By: /s/ Edward D. Buckley

Edward D. Buckley

Georgia Bar No. 092750

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Counsel for Plaintiff Gerald Bostock

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This 21st day of March 2022.

By: /s/ Edward D. Buckley
Edward D. Buckley
Georgia Bar No. 092750

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CLAYTON COUNTY,)	
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ORDER

The Court is in receipt of Plaintiff’s Motion to File Under Seal in which Plaintiff requests to file the following under seal:

1. Plaintiff’s Exhibit 43 (which was used, with this same exhibit number, at more than one deposition in this case); and
2. The following lines of the transcript of the deposition of Leslie Moore: 51:18 52:2-13, 53:9-14, 53:16-23, 54:9-12, 55:3-8, and 63:12-17.

Upon review, the Court GRANTS Plaintiff’s Motion.

IT IS SO ORDERED this ____ day of ____, 2022.

WALTER E. JOHNSON
UNITED STATES MAGISTRATE JUDGE