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7 *Attorneys for Defendants*  
8 *State of Arizona, Andy Tobin, and Paul Shannon*

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.

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**

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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 C and D to the Declaration of Ryan Curtis In Support Of State Defendants’  
22 Opposition to Plaintiff’s Motion for Summary Judgment (the “Declaration”), filed  
23 concurrently. Exhibits C and D to the Declaration contain confidential and proprietary  
24 information that is protected from public disclosure under the Federal Rules of Civil  
25 Procedure and the Stipulated Protective Order (Doc. 165).

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A proposed Order is appended hereto.

DATED this 26th day of October, 2022.

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

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11 Russell B. Toomey,  
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 14 State of Arizona, *et al.*  
 15 Defendants.

No. 4:19-cv-00035

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

19 IT IS ORDERED that the Motion is granted.

20 IT IS FURTHER ORDERED directing the Clerk to file Exhibits C and D to the  
 21 Declaration of Ryan Curtis under seal.

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