

The Honorable Robert J. Bryan

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

C. P., by and through his parents, Patricia
Pritchard and Nolle Pritchard; and
PATRICIA PRITCHARD,

Plaintiffs,

v.

BLUE CROSS BLUE SHIELD OF ILLINOIS,

Defendant.

NO. 3:20-cv-06145-RJB

PLAINTIFFS' PLACEHOLDER
MOTION TO SEAL-REDACT

**Note on Motion Calendar:
October 28, 2022**

Pursuant to Local Civil Rule 5(g), and with the agreement of counsel for Defendant BCBSIL, Plaintiff files this Motion to Seal/Redact so that the parties who seek to seal/redact confidential information may satisfy the requirements of LCR 5(g)(3)(B) in its responsive briefing.

As certified by Plaintiffs' counsel, on Wednesday, August 24, 2022, defense counsel was provided a list of the exhibits labeled "confidential" that Plaintiffs intended to use to support their Motion for Class Certification. Hamburger Decl. (8/25/22), ¶12. Defense counsel indicated that Exhibits A-I, L, O and Q should be filed under seal. *Id.* Plaintiffs will also file their Motion for Class Certification under seal to allow Defendant the opportunity to review the Motion for any reference to confidential information.

1 On Thursday, August 25, 2022, the parties' counsel met and conferred about how
2 to handle the filing of confidential documents throughout the class certification briefing.
3 *Id.*, ¶13. The parties' counsel agreed that this Motion will serve as the placeholder
4 motion for all documents marked confidential by either party that are relied upon in the
5 class certification briefing and filed with the Court. *Id.* The noting date of this Motion
6 is, by agreement of the parties, October 28, 2022. The parties further agree that the
7 proponents of sealing will address the reasons for sealing and provide redacted versions
8 of any exhibits or briefing in responsive briefing filed on or before October 24, 2022.
9 Reply briefing, if any will be due on the noting date.

10 DATED: August 25, 2022.

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13 /s/ Eleanor Hamburger

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