

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA**

BRIANNA BOE, et al.,

Plaintiffs,

and

UNITED STATES OF AMERICA,

Plaintiff-Intervenor,

v.

STEVE MARSHALL, et al.,

Defendants.

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Case No. 2:22-CV-184-LCB

MOTION FOR LEAVE TO FILE UNDER SEAL

Respondents Melody H. Eagan and Jeffrey P. Doss (“Respondents”) move this Court for leave to file under seal their Motion to Receive Clarification of Order to Show Cause and Notice of Proposed Testimony and all future filings related to the Court’s Order to Show Cause (Doc. 406) so long as that order remains under seal. As in support of this Motion, Respondents show as follows:

1. On February 21, 2024, this Court entered an Order to Show Cause (Doc. 406) (the “Show Cause Order”), which was filed under seal.
2. Respondents intend to file a Motion to Receive Clarification of Order to Show Cause and Notice of Proposed Testimony (“Motion to Receive

Clarification”), in which they reference, cite, and quote portions of the Show Cause Order.

3. In order to avoid publicly revealing aspects of the sealed Show Cause Order, Respondents desire to file their Motion to Receive Clarification under seal.

4. Respondents also anticipate that future filings related to the Show Cause Order will be necessary. Because these filings will necessarily relate to and potentially cite to or reference the Show Cause Order, Respondents also desire to file those pleadings under seal. A single order permitting future filings related to the Show Cause Order to be filed under seal would promote efficiency and avoid duplicative requests by Respondents to file future filings under seal.

WHEREFORE, Respondents respectfully request that the Court enter an order granting them leave to file their Motion to Receive Clarification and any future filings related to the Show Cause Order under seal so long as that order remains under seal.

Respectfully Submitted,

/s/ M. Christian King

One of the Attorneys for Melody H. Eagan
and Jeffrey P. Doss

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CERTIFICATE OF SERVICE

I hereby certify that on this 4th day of March, 2024, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to counsel of record in this case.

M. Christian King
OF COUNSEL