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UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

\_\_\_\_\_  
Plaintiff(s),

v.

Case No. \_\_\_\_\_

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\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
Defendant(s).

**JOINT MOTION REGARDING CONTINUED SEALING**

Documents have been filed under temporary seal in connection with the following motion:

*(Motion Title)*

*(Doc. No.)*

Pursuant to LR 5.6, the parties submit this Joint Motion Regarding Continued Sealing.

<b>DKT. NO.</b>	<b>DKT. NO. OF REDACTED VERSION (IF FILED)</b>	<b>DESCRIPTION OF DOCUMENT</b>	<b>PRECISELY IDENTIFY: a) The information that the parties agree should remain sealed; b) The information the parties agree should be unsealed; and c) The information about which the parties disagree.</b>	<b>NONPARTY THAT DESIGNATED DOC. CONFIDENTIAL (IF ANY)</b>	<b>REASON WHY DOCUMENT SHOULD REMAIN SEALED OR BE UNSEALED<sup>i</sup></b>
56	55	Unredacted copy of defendant J. Smith's brief in support of motion for summary judgment	Parties agree that information re: minor FJB should remain sealed.	N/A	Redacted portions of brief contain information about FJB. FJB is a minor.
57		Plaintiff's bank records from 2012	Parties agree entire document should remain sealed.	N/A	Confidential financial records.
58		Email from K. Nelson to R. Jones dated 04/30/15	Parties agree that entire third-party document should remain sealed.	Acme Insurance Agency	Email was designated as confidential under a nondisclosure agreement between defendant J. Smith and nonparty Acme.
59	40	Unredacted portions of F. Mendoza's deposition	Parties agree with the court's order to seal portions of the deposition.	N/A	Redacted portions of deposition were ordered sealed by Magistrate Judge O'Malley on 03/01/16 [Docket No. 48].
60		Email from plaintiff to J. Smith	Parties agree entire document should be unsealed.	N/A	Confidential designation withdrawn by defendant J. Smith.
71		Record from 2010 divorce action involving plaintiff and her ex-husband	Parties disagree. Defendant asserts entire document should be unsealed. See	N/A	Plaintiff asserts document contains confidential information about her mental

			Plaintiff's proposed redactions, at doc. no. 90.		health; defendant contends that information is not confidential because it was disclosed by plaintiff on Facebook in 2010.
72		Contract between parties, dated 5.1.2015.	Parties disagree. Plaintiff asserts that clauses 3, 7, and 10 should remain sealed; defendant asserts that only clause 3 should remain sealed.	N/A	Plaintiff asserts that clauses 3, 7, and 10 reveals trade secrets. Defendant asserts that only clause 3 reveals trade secrets.

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<sup>i</sup> This explanation should be very brief. For example:

1. contains information designated as confidential by a nonparty
2. contains information designated as confidential under a non-disclosure agreement between plaintiff and nonparty
3. contains information designated as confidential under a protective order issued in this case [Docket No. XX]
4. discovery materials filed in connection with a motion under Fed R. Civ. P. 37
5. reveals trade secrets of defendant
6. reveals proprietary business methods of plaintiff
7. confidential financial records

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8. confidential medical records
  9. contains termination information regarding former employees of defendant
  10. reveals information regarding a minor
  11. contains information ordered sealed by the court on DATE [Docket No. XX]