

No. 18-398

IN THE
Supreme Court of the United States

Supreme Court, U.S.
FILED

NOV 28 2018

OFFICE OF THE CLERK

FCA US LLC AND HARMAN INTERNATIONAL
INDUSTRIES, INCORPORATED,

Petitioners,

v.

BRIAN FLYNN, GEORGE & KELLY BROWN, AND
MICHAEL KEITH, INDIVIDUALLY AND ON BEHALF OF
OTHERS SIMILARLY SITUATED,

Respondents.

**On Petition for Writ of Certiorari
To the United States Court of Appeals
For the Seventh Circuit**

**MOTION FOR LEAVE TO FILE BRIEF UNDER
SEAL**

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MOTION FOR LEAVE TO FILE BRIEF UNDER SEAL

Respondents, Brian Flynn, George and Kelly Brown, and Michael Keith, individually and on behalf of others similarly situated, move the Court for leave to their Opposition to Petition for a Writ of Certiorari under seal.

Pursuant to the Stipulated Protective Order entered by the U.S. District Court for the Southern District of Illinois in the action pending below, “[n]o documents, information, or things designated as ‘Confidential’ or ‘Attorneys’ Eyes Only’ shall be filed with the Court, including that contained in pleadings, motions, briefs, declarations, or exhibits, except under seal.” No. 15-cv-0855, Docket Entry 148 ¶ 15 (S.D. Ill. Jan. 9, 2017). A court filing including or referencing documents, information, or things designated by a party as “Confidential” or “Attorneys’ Eyes Only” is to be filed under seal and properly redacted after receiving leave of Court. *Id.* Portions of Respondents’ Opposition reference, discuss, and analyze certain documents produced by Defendants/Petitioners as “Confidential” or “Attorneys’ Eyes Only,” and certain deposition testimony from Defendants’/Petitioners’ witnesses that Defendants have designated “Confidential,” in the action pending below.

Therefore, with this Court’s permission, Respondents will file two versions of their Opposition to Petition for a Writ of Certiorari: a redacted version of the brief for public viewing, and an unredacted version of the brief under seal.

Respectfully submitted,



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