

No. 15-A_____

In the Supreme Court of the United States

In re The Center for Medical Progress, BioMax Procurement Services, LLC, David Daleiden, and Troy Newman,

Petitioners-Appellants,

v.

United States District Court for the Northern District of California, and National Abortion Federation,

Respondents-Appellees

To the Honorable Anthony Kennedy
Associate Justice of the United States Supreme Court and
Circuit Justice for the Ninth Circuit

Motion to Leave to File Documents Under Seal

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December 4, 2015

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To the Honorable Anthony Kennedy, Associate Justice of the United States Supreme Court and Circuit Justice for the U.S. Court of Appeals for the Ninth Circuit:

Petitioners have filed an Emergency Application for Stay. Petitioners respectfully request leave to file, under seal, discovery that is in dispute in this case. *See Doe v. Gonzales*, 546 U.S. 1301, 1303 (2005) (Ginsburg, J.) (“grant[ing] the parties’ accompanying motions for leave to file under seal”).

Petitioners filed the documents under seal in the district court, because they discuss information covered by the district court’s Protective Order. The documents are designated “Highly Confidential—Attorneys’ Eyes Only” under the Protective Order.

Respondents filed the same documents under seal in the Ninth Circuit in Case Number 15-17318 as Exhibit 11 to their Opposition to Petitioners’ Emergency Motion to Stay.

Therefore, Petitioners ask that the Court grant their motion.

Respectfully submitted,

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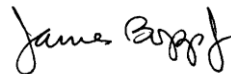
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Certificate of Service

I, James Bopp, Jr., a member of the bar of this court, certify that on December 4, 2015, I served a copy of the foregoing on the following by Federal Express, and served a courtesy copy *via* e-mail on:

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