

IN THE UNITED STATES COURT OF FEDERAL CLAIMS

FAIRHOLME FUNDS, INC., <i>et al.</i> ,	)	
	)	
Plaintiffs,	)	
	)	No. 13-465C
v.	)	(Judge Sweeney)
	)	
THE UNITED STATES,	)	
	)	
Defendant.	)	

**PLAINTIFFS’ MOTION FOR GENERAL LEAVE TO FILE DISCOVERY MATERIALS
UNDER SEAL IN OTHER LITIGATION CHALLENGING THE NET WORTH SWEEP**

On September 4, 2015, this Court granted Plaintiffs leave to file certain Protected Information under seal in other litigation challenging the Net Worth Sweep. Doc. 240, at 2. Specifically, the Court authorized Plaintiffs to file under seal the materials identified in Plaintiffs’ motions to remove the “Protected Information” designations from various materials produced in discovery. *See* Docs. 148, 162, 165, 166, 169, 170, 171. In the weeks since Plaintiffs filed those motions, they have identified additional materials that they believe other courts considering challenges to the Net Worth Sweep would find useful. Rather than identifying those materials here and filing additional such motions as Plaintiffs continue to review discovery materials, Plaintiffs move for general leave to file any and all Protected Information under seal in other litigation challenging the Net Worth Sweep. The Court previously granted Plaintiffs general authority to file Protected Information in Plaintiffs’ suit in the D.C. Circuit and D.D.C. Doc. 212 (July 21, 2015). For the same reasons, the Court should also grant Plaintiffs general authority to file Protected Information under seal in other cases that concern challenges to the Net Worth Sweep.

Plaintiffs consulted opposing counsel, and the United States opposes this motion.

Date: September 29, 2015

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Respectfully submitted,

s/ Charles J. Cooper

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CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing was served upon all counsel of record on this 29th day of September, 2015, via the Court's Electronic Case Filing system.

s/ Charles J. Cooper
Charles J. Cooper