

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

IN RE: NATIONAL PRESCRIPTION)	MDL No. 2804
OPIATE LITIGATION)	
)	Case No. 1:17-md-2804
THIS DOCUMENT RELATES TO:)	
)	Judge Dan Aaron Polster
ALL CASES)	
)	Mag. Judge David A. Ruiz
)	
)	
)	

**PLAINTIFF CITY OF CLEVELAND’S MOTION FOR LEAVE TO FILE
MOTION TO DISQUALIFY CAROLE RENDON UNDER SEAL**

Pursuant to Local Rule 5.2, Plaintiff City of Cleveland seeks leave of Court to file its Motion for Leave to Disqualify Carole Rendon and accompanying documents in the above-listed case under seal. Plaintiff files this Motion and Proposed Order to ensure compliance with CMO No. 2: Protective Order (ECF Doc. 441) and the Protective Order Re: DEA’s ARCOS/DADS Database (ECF Doc. 167). Plaintiff respectfully requests the option to proceed in this manner so there are no inadvertent disclosures of confidential information subject to CMO No. 2 or the ARCOS Protective Order.

WHEREFORE, Plaintiff respectfully requests the Honorable Court to grant Plaintiff’s Motion for Leave to Disqualify Carole Rendon Under Seal.

Respectfully submitted,

s/Mark Pifko

Mark Pifko
BARON & BUDD, P.C.
15910 Ventura Boulevard, Suite 1600
Los Angeles, California 91436
(818) 839-2325
(818)986-9698 (Fax)
mpifko@baronbudd.com

s/Peter H. Weinberger

Peter H. Weinberger (0022076)
SPANGENBERG SHIBLEY & LIBER
1001 Lakeside Avenue East, Suite 1700
Cleveland, OH 44114
(216) 696-3232
(216) 696-3924 (Fax)
pweinberger@spanglaw.com

Counsel for Plaintiff the City of Cleveland

CERTIFICATE OF SERVICE

I hereby certify that on January 8, 2019, I electronically filed the foregoing with the Clerk of Court by using the CM/ECF system. Copies will be served upon counsel of record by, and may be obtained through, the Court CM/ECF system.

s/Mark Pifko

Mark Pifko
Counsel for Plaintiff the City of Cleveland