

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

**IN RE: NATIONAL PRESCRIPTION  
OPIATE LITIGATION**

This document relates to:

*ALL TRACK ONE CASES*

MDL No. 2804

Case No. 1:17-md- 2804

Hon. Dan Aaron Polster

**ENDO DEFENDANTS' MOTION FOR LEAVE TO FILE UNDER SEAL AN  
UNREDACTED VERSION OF ITS OPPOSITION TO MOTION TO DISQUALIFY**

Endo Pharmaceuticals Inc. and its affiliated companies (collectively “Endo”) hereby move for leave to file two versions of their response to the City of Cleveland, Cuyahoga County, the City of Akron and Summit County’s (“Plaintiffs”) now joint Motion to Disqualify. Specifically, Endo seeks permission to file a redacted copy of the brief and accompanying exhibits on the public docket and an unredacted copy of the brief and certain accompanying exhibits under seal.

This Court’s protective order provides:

Only Confidential or Highly Confidential portions of relevant documents are subject to sealing. To the extent that a brief, memorandum, or pleading references any document designated as Confidential or Highly Confidential, then the brief, memorandum or pleading shall refer the Court to the particular exhibit filed under seal without disclosing the contents of any confidential information. If, however, the confidential information must be intertwined with the text of the document, a party may timely move the Court for leave to file both a redacted version for the public docket and an unredacted version for sealing.

Dkt. # 441, ¶ 62.

Endo’s brief and certain exhibits contain references to portions of two depositions that

have been marked Confidential by Plaintiffs. As a result, in compliance with the Protective Order, Endo hereby moves to file both a redacted version and an unredacted version of its brief and exhibits. The redacted version will remove any Confidential or Highly Confidential information as those terms are defined in the Court's protective order. Dkt. # 441.

Respectfully submitted,

*/s/ John D. Parker*

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on January 23, 2019, the foregoing was filed electronically with the Clerk of Court using the Court's CM/ECF system and will be served via the Court's CM/ECF filing system on all attorneys of record.

DATED: January 23, 2019

*/s/ John D. Parker*

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John D. Parker