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13  
14 **IN THE UNITED STATES DISTRICT COURT**  
15 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**  
**(Western Division)**

16 CLIFTON W. MARSHALL, et al.,

17 *Plaintiffs,*

18 v.

19 NORTHROP GRUMMAN  
20 CORPORATION, et al.,

21 *Defendants.*

Case No. 16-CV-6794 AB (JCx)

**APPLICATION FOR LEAVE TO  
FILE UNDER SEAL**

[Filed concurrently with Decl. of Kurt C.  
Struckhoff In Support of Application for  
Leave to File Under Seal and [Proposed]  
Order]

Hon. André Birotte Jr.

1 In accordance with L.R. 79-5.2.2(b), Plaintiffs submit this Application for Leave  
2 to File Under Seal their Unredacted Statement of Genuine Disputes, their  
3 Unredacted Memorandum in Support of their Memorandum in Opposition to  
4 Defendants' Motion for Partial Summary Judgment, and Exhibits P1, P4–P6, P9,  
5 P13–P18, P24–P28, P30–P32, P35, P37–P42, P44–P46, P48, P52, P57–P60, P62,  
6 P64, P67, P69, P70, and pP73–P78 filed in support of Plaintiffs' Statement of  
7 Genuine Disputes. Plaintiffs, Defendants, or third parties (Financial Engines and  
8 Callan) have designated these exhibits as Confidential under the terms of the  
9 protective order. Doc. 108. Plaintiffs' Statement of Genuine Disputes and their  
10 Memorandum incorporate excerpts of these designated materials. Defendants,  
11 Financial Engines, and Callan shall have four days of the filing of this Application  
12 to file a declaration establishing that the designated material is sealable under L.R.  
13 79-5.2.2(b)(i). Plaintiffs submit currently with this Application the Declaration of  
14 Kurt C. Struckhoff to maintain under seal portions of Exhibit P44.

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16 Dated: March 29, 2019

Respectfully submitted,

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18 By: /s/ Sean E. Soyars  
19 Sean E. Soyars (*pro hac vice*)  
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