

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO

Civil Action No. 08-cv-02321-JLK-KMT

COMMON CAUSE OF COLORADO,
on behalf of itself and its members;
MI FAMILIA VOTA EDUCATION FUND,
on behalf of itself and its members; and
SERVICE EMPLOYEES INTERNATIONAL UNION,
on behalf of itself and its members,

Plaintiffs,

v.

BERNIE BUESCHER, in his official capacity as Secretary of State for the State of
Colorado,

Defendant.

UNOPPOSED MOTION TO FILE UNDER SEAL

Defendant Bernie Buescher, the Secretary of State for the State of Colorado (the "Secretary"), by and through undersigned counsel, asks this Court to file under seal the Secretary's Exhibits A through Exhibit D to Attachment No. 7 to the Secretary's Reply in Further Support of his Motion to Dismiss Amended Complaint filed electronically on August 14, 2009.

1. The parties have agreed that these documents should be filed under seal to protect the confidentiality of material personally identifiable information. A protective order is in place to maintain the confidentiality of information such as tha

contained in Exhibits A through D of Attachment 7 to the Secretary's Reply in Further Support of Motion to Dismiss Amended Complaint.

2. The information the Secretary asks the Court to seal may include voters' signatures, telephone numbers, date of birth, driver's license numbers, social security numbers, department of revenue identification numbers, and information required to be kept confidential pursuant to section 24-72-204, C.R.S.

CONCLUSION

The Secretary requests the Court permit the Secretary to file Exhibits A through Exhibit D to Attachment No. 7 to the Secretary's Reply in Further Support of his Motion to Dismiss Amended Complaint under seal.

Submitted this 14th day of August, 2009.

JOHN W. SUTHERS
Attorney General

s/ Maurice G. Knaizer
MAURICE G. KNAIZER*
Deputy Attorney General

s/ Monica M. Márquez
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CERTIFICATE OF SERVICE

I hereby certify that on August 14, 2009, I served a true and complete copy of the within UNOPPOSED MOTION TO FILE UNDER SEAL upon all parties by the method indicated below:

<u>Party Type</u>	<u>Attorney</u>	<u>Firm and/or Address</u>	<u>Method</u>
Plaintiffs	James E. Johnson jejohnson@debevoise.com S. Gale Dick sgdick@debevoise.com	Debevoise & Plimpton, LLP 919 Third Avenue New York, NY 10022	Email and U.S. Mail
Plaintiffs	Richard Rosenblatt Rosenblatt@cwa-union.org	Richard Rosenblatt & Associates, LLC 8085 East Prentice Avenue Greenwood Village, CO 80111	Email and U.S. Mail
Plaintiffs	Penda D. Hair phair@advancementproject.org Elizabeth S. Westfall ewestfall@advancementproject.org Bradley Heard bheard@advancementproject.org	Advancement Project 1220 L. Street NW, Suite 850 Washington, DC 20005	Email and U.S. Mail
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