

**UNITED STATES DISTRICT COURT
DISTRICT OF COLORADO**

COMMON CAUSE OF COLORADO, on behalf of itself :
and its members; MI FAMILIA VOTA EDUCATION :
FUND; and SERVICE EMPLOYEES INTERNATIONAL :
UNION, on behalf of itself and its members, :
: Civil No. 08-CV-2321-JLK
: Plaintiffs, :
: :
: vs. :
: :
: BERNIE BUESCHER, in his official capacity as Secretary :
of State for the State of Colorado, :
: :
: Defendant. :

JOINT MOTION TO FILE UNDER SEAL

Plaintiffs Common Cause of Colorado, Mi Familia Vota Education Fund, and Service Employees International Union (together “Plaintiffs”), through their undersigned attorneys, ask this Court to file under seal the following documents filed electronically on April 3, 2009: (1) Motion for Enforcement of Stipulation; (2) Memorandum of Law in Support of Motion for Enforcement of Stipulation, and (3) exhibits related to Memorandum of Law in Support of Motion for Enforcement of Stipulation. Plaintiffs file this motion in order to maintain the confidentiality of personally identifiable material of certain Colorado voters, contained in the foregoing documents, that the Defendant has shared with Plaintiffs, including signatures, electronic mail addresses, telephone numbers, dates of birth, social security numbers, drivers license numbers, department of

revenue identification numbers, and information required to kept confidential pursuant to section 24-72-204 (3.5), C.R.S. and pursuant to the Colorado “Address Confidentiality Program Act” (section 24-21-201 et seq., C.R.S.), according to the terms of the Stipulated Protective Order of November 4, 2008. Defendant Buescher joins Plaintiffs in this motion.

Dated: April 3, 2009

Respectfully submitted by:

/s/ Elliot Greenfield

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CERTIFICATE OF SERVICE

I, Elliot Greenfield, herein certify under penalty of perjury that on April 3, 2009, I electronically filed Plaintiffs' Motion to File Under Seal with the Clerk of the Court for the United States District of Colorado. I certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system upon:

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Executed April 3, 2009

/s/ Elliot Greenfield

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Defendant. :

Civil No. 08-CV-2321-JLK

(Proposed) Order

And now, this _____ day of _____ 2009, upon
consideration of the parties' joint motion to seal certain documents filed on April 3, 2009,
it is **ORDERED** that the motion is **GRANTED**. The Clerks Office is directed to seal the
following documents: (1) Motion for Enforcement of Stipulation; (2) Memorandum of
Law in Support of Motion for Enforcement of Stipulation, and (3) exhibits related to
Memorandum of Law in Support of Motion for Enforcement of Stipulation.

Judge Kane, U.S. District Judge