UNITED STATES DISTRICT COURT

DISTRICT OF MASSACHUSETTS

Three Angels Broadcasting Network, Inc., an Illinois non-profit corporation, and Danny Lee Shelton, individually,

Case No. 07-40098-FDS

Plaintiffs,

V.

Gailon Arthur Joy and Robert Pickle,

Defendants.

PLAINTIFFS' MOTION FOR LEAVE TO FILE UNDER SEAL

Plaintiffs Three Angels Broadcasting Network, Inc. and Danny Lee Shelton seeks leave of the Court to file under seal the following exhibits to the Affidavit of M. Gregory Simpson filed in Support of Plaintiff's Motion to Enforce Protective Order (Doc. 116): Exhibit A (an email from Walt Thompson to Mollie Steenson) and Exhibit B (emails between counsel for Plaintiffs and the Defendants regarding Walt Thompson).

This motion is authorized by the Confidentiality and Protective Order entered in this case on April 17, 2008 (Doc. 60), which provides that "If no agreement is reached [regarding the use of material designed as "Confidential"], the matter shall be submitted to the Court by the party opposing the use of Confidential Information by motion wit the material at issue filed under seal per the provision of Local Rule 7.2."

WHEREFORE, Plaintiffs pray the Court to allow these exhibits to be filed under seal, and to allow them to remain impounded until further order of the Court.

Dated: October 6, 2008 FIERST, PUCCI & KANE, LLP

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and SIEGEL, BRILL, GREUPNER, DUFFY & FOSTER, P.A.

s/ M. Gregory Simpson

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Attorneys for Plaintiffs

Certificate of Service

I, M. Gregory Simpson, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on October 6, 2008.

Dated: October 6, 2008 /s/ M. Gregory Simpson

M. Gregory Simpson