## UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

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

Plaintiffs,

Defendants.

v.

Gailon Arthur Joy and Robert Pickle,

Case No.: 07-40098-FDS

## DEFENDANT PICKLE'S MOTION TO FILE UNDER SEAL

Defendant Robert Pickle seeks leave of the Court to file under seal the following exhibits to his affidavit filed in opposition to Plaintiffs' pending Motion for a Protective Order: Exhibit O at Exhibit R: an extremely short document that demonstrates the degree of control that 3ABN has over its foreign affiliates, declared to be confidential by the Plaintiffs; Exhibit O at Exhibit S: a contract that shows that DLS Publishing received payments that may have been attributable to work done by Danny Lee Shelton, declared to be confidential by the Plaintiffs; Exhibit O at Exhibit S at Exhibits EE–GG: pages from Danny Lee Shelton's personal tax returns for the years 2001 through 2003, which affirm his claim that he falsified a figure on his 2003 tax return; Exhibit O at Exhibit HHH: a report regarding a 3ABN personnel issue, which documents that 3ABN paid for personal expenses of Danny Lee Shelton, declared confidential by the Plaintiffs; and Exhibit MM, a report that suggests that 3ABN personnel may have tried to evade foreign laws in the setting up and operation of their foreign affiliates.

WHEREFORE, Defendant Pickle prays the Court to allow these exhibits to be filed under seal.

Respectfully submitted,

Dated: July 9, 2008

/s/ Robert Pickle, pro se

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## **AFFIDAVIT OF SERVICE**

Under penalty of perjury, I, Bob Pickle, 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) on July 9, 2008.

Dated: July 9, 2008

/s/ Bob Pickle