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**SUPERIOR COURT FOR THE STATE OF CALIFORNIA
COUNTY OF SAN BERNADINO**

CHRISTOPHER O'BRIEN and TIFFANY
KIPIKASHA, individually and on behalf of all
others similarly situated,

Plaintiffs,

vs.

SUNSHINE MAKERS, INC., a California
Corporation,

Defendant.

Case No.: CIV-SB-2027994
Case Filed: December 18, 2020
Assigned to the Hon. David Cohn

**PLAINTIFFS' MOTION TO FILE UNDER
SEAL UNREDACTED VERSIONS OF
PLAINTIFFS' MOTION FOR FINAL
APPROVAL OF CLASS ACTION
SETTLEMENT, MOTION FOR AWARD
OF ATTORNEYS' FEES AND COSTS,
AND DECLARATION OF
CHRISTOPHER D. MOON ISO FINAL
APPROVAL MOTION**

Hearing Information
Date: September 21, 2021
Time: 10:00 a.m.
Dept.: S-26

TO THE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that, pursuant to California Rule of Court 2.551 and San Bernardino Superior Court Local Rule of Court 571, Plaintiffs Christopher O'Brien, Tiffany Kipikasha, and Michelle Moran ("Plaintiffs") hereby request this Court seal (1) the unredacted version of the Memorandum of Points and Authorities in Support of Motion for Final Approval of Class Action Settlement ("Final Approval Motion"); (2) the unredacted version of the Memorandum of Points and Authorities in Support of the Motion for Award of Attorneys' Fees and Costs ("Fees and Costs Motion"); and (3) the unredacted version of the Declaration of Christopher D. Moon in Support of Final Approval of Class Action Settlement, Motion for Award of Attorneys' Fees and Costs, and Motion for Service Awards to Settlement Class Representatives ("Moon Declaration").

In the course of discovery and settlement negotiations in the instant matter, Defendant produced sales data for the Simple Green "Non-Toxic" products that are the subject of this action and the Final Approval Motion, Fees and Costs Motion, and Moon Declaration. Mot. to Seal Decl. at ¶ 3. The sales data describes the total units sold and total gross sales, for each fiscal year, for an approximately five-year period. *Id.* Defendant designated the sales data as "highly confidential" under the terms of the confidentiality agreement executed by the Parties, which prohibits public use or disclosure of such information. *Id.* As such, Plaintiffs are required to file, pursuant to Cal. R. Ct. 2.551, the instant motion to seal the portions disclosing sales figures in Plaintiffs' Final Approval Motion, Fees and Costs Motion, and Moon Declaration. Mot. to Seal Decl. at ¶ 3. Plaintiffs only request extremely limited redactions in the documents, at the locations specified, of sales figures derived from Defendant's designated highly confidential materials, as follows:

Document	Page and Line Citation	Description of Redacted Information
MPA ISO Final Approval Motion	Page 4, Line 27 to Page 5, Line 2	Sales Figures
MPA ISO Final Approval Motion	Page 10, Lines 20-26	Sales Figures

1	MPA ISO Final Approval	Page 11, Lines 2-3	Sales Figures
2	Motion		
3	MPA ISO Final Approval	Page 11, Lines 4-5	Sales Figures
4	Motion		
5	MPA ISO Final Approval	Page 11, Lines 7-13	Sales Figures
6	Motion		
7	MPA ISO Final Approval	Page 14, Lines 2-4	Sales Figures
8	Motion		
9	MPA ISO Fees and Costs	Page 4, Line 20	Sales Figures
10	Motion		
11	MPA ISO Fees and Costs	Page 10, Line 6	Sales Figures
12	Motion		
13	MPA ISO Fees and Costs	Page 11, Lines 9-10	Sales Figures
14	Motion		
15	MPA ISO Fees and Costs	Page 11, Lines 12-13	Sales Figures
16	Motion		
17	MPA ISO Fees and Costs	Page 12, Lines 14-15	Sales Figures
18	Motion		
19	Moon Declaration ISO Final	Page 7, Lines 8-22	Sales Figures
20	Approval Motion and Fees		
21	and Costs Motion		
22	Moon Declaration ISO Final	Page 11, Lines 8-12	Sales Figures
23	Approval Motion and Fees		
24	and Costs Motion		
25	Moon Declaration ISO Final	Page 18, Lines 15-17	Sales Figures
26	Approval Motion and Fees		
27	and Costs Motion		

Mot. to Seal Decl. at ¶ 3.

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Accordingly, Plaintiffs respectfully request this Court seal unredacted sales figures in Plaintiffs' Final Approval Motion, Fees and Costs Motion, and Moon Declaration as set forth above.

Dated: August 27, 2021

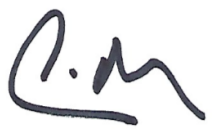
Respectfully submitted,

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