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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA**

**CRUISE LINES INTERNATIONAL
ASSOCIATION ALASKA, and CRUISE
LINES INTERNATIONAL
ASSOCIATION,**

Plaintiffs,

v.

**THE CITY AND BOROUGH OF JUNEAU,
ALASKA, a municipal corporation, and
RORIE WATT, in his official capacity as
City Manager**

Defendants.

Case No.: 1:16-cv-00008-HRH

**THE CITY AND BOROUGH OF JUNEAU AND RORIE WATT'S SEALED MOTION
REQUESTING LEAVE TO FILE PLEADINGS AND EXHIBITS UNDER SEAL**

Defendants, The City and Borough of Juneau and Rorie Watt (hereafter collectively "CBJ"), by and through their attorney Robert P. Blasco, of Hoffman & Blasco, LLC, pursuant to Local Rule (Civil) 5.4, respectfully moves the Court for an Order granting leave to file the unredacted copies of *The City and Borough of Juneau and Rorie Watt's Cross Motion for Summary Judgment and Opposition to Plaintiffs' Motion for Summary Judgment* ("Cross Motion and Opposition"), *The City and Borough of Juneau and Rorie Watt's Objections and Responses to*

Plaintiffs' Statement of Facts in Support of Motion for Summary Judgment ("Objections and Responses"), and *The City and Borough of Juneau and Rorie Watt's Statement of Facts in Support of CBJ's Cross Motion for Summary Judgment and Opposition to Plaintiffs' Motion for Summary Judgment and in Support of CBJ's Motion to Strike Certain Exhibits*, and certain exhibits cited and discussed therein. These exhibits are relevant to the issues in Plaintiffs' Motion for Summary Judgment and CBJ's Opposition and Cross Motion and necessary for CBJ's arguments in defense and affirmatively for the CBJ Cross Motion.

Pursuant to Local Rule 5.4(a)(1)[A], the basis for sealing the un-redacted copies of the pleadings and the following exhibits is that the information is designated as Confidential (hereafter designated with "C") or Highly Confidential hereafter designated with ("HC") by Cruise Lines International Association and Cruise Lines International Association Alaska ("CLIAA"). CBJ does not agree these documents are confidential or highly confidential, but are submitting these under seal pursuant to *The Stipulation and Protective Order Governing the Production and Exchange of Confidential Information* (Docket 44-1):

- Exhibit AT CLIA0039C-41C
- Exhibit AW CLIA004650C-4651C
- Exhibit BB CLIA003909C-3910C
- Exhibit BE CLIA003911C-3913C
- Exhibit BH CLIA02322C-2324C
- Exhibit BS CLIA006048C-6049C
- Exhibit BW, CLIA002977C-2980C
 pgs. 1-4
- Exhibit BZ, CLIA001733C-1734C
 pgs. 1-2
- Exhibit CA CLIA001789HC
- Exhibit CB CLIA002103HC, CLIA002104C-2106C
- Exhibit CD CLIA0001637HC-1639HC
- Exhibit CE CLIA01933HC-1936HC
- Exhibit CF CLIA001521HC-1523HC

- Exhibit ED CLIA004309C-4312C
- Exhibit EJ CLIA000907C-910C
- Exhibit EP CLIA005086C-005092C
- Exhibit EQ CLIA004318C-4321C
- Exhibit ER CLIA004427C-CLIA004428C
- Exhibit ES CLIA004125C-CLIA004128C
- Exhibit ET CLIA002239C-2241C
- Exhibit EU CLIA00179C-CLIA00180C
- Exhibit FB CLIA002219-2222C
- Exhibit FC CLIA000001-000002C
- Exhibit FI CLIA02329C-2331C
- Exhibit FP CLIA002710-CLIA002713C
- Exhibit FR CLIA004297C
- Exhibit FT CLIA003688C-CLIA003701C
- Exhibit FV CLIA004236C-CLIA004246C
- Exhibit FW CLIA006042C
- Exhibit FX CLIA006063C-CLIA006064C
- Exhibit HT CLIA006045C-6046C, CLIA006047C, CLIA006048C
- Exhibit IB CLIA000972C
- Exhibit IH CLIA002277C-002278C
- Exhibit IN CLIA004997C-5009C
- Exhibit IO, CLIA004946-4949C
pgs 1-4
- Exhibit IT CLIA04077C-04078C
- Exhibit IZ CLIA002651C-2653C
- Exhibit JA CLIA002654C-2657C
- Exhibit JO CLIA002269C-2272C
- Exhibit KG CLIA0005370C
- Exhibit KI CLIA003484C
- Exhibit KO CLIA005383C
- Exhibit KT CLIA02366C, 23673C
- Exhibit KW CLIA2325HC-2325HC
- Exhibit LP CLIA002642-2645C
- Exhibit LR CLIA002737-2739HC

CBJ defers to CLIAA to provide this Court with the basis for the designation and the need to file it under seal. CBJ does not have any information as to why the Plaintiffs designated these documents as Confidential or Highly Confidential.

For the reasons stated above, and incorporating any additional reasons to be supplied to the Court by CLIAA, CBJ respectfully requests leave to file under seal an un-redacted copy of *The City and Borough of Juneau and Rorie Watt's Cross Motion for Summary Judgment and Opposition to Plaintiffs' Motion for Summary Judgment* ("Cross Motion and Opposition"), *The City and Borough of Juneau and Rorie Watt's Objections and Responses to Plaintiff's Statement of Facts in Support of Motion for Summary Judgment* ("Objections and Responses"), and *The City and Borough of Juneau and Rorie Watt's Statement of Facts in Support of CBJ's Cross Motion for Summary Judgment and Opposition to Plaintiff's Motion for Summary Judgment and in Support of CBJ's Motion to Strike Certain Exhibits*, and a copy of the Exhibits listed above. CBJ has provided with this motion the proposed un-redacted filings and exhibits. CBJ will file the actual un-redacted filings and exhibits under seal upon the Court's order.¹

HOFFMAN & BLASCO, LLC

Dated: January 30, 2018

By: /s/ Robert P. Blasco
Robert P. Blasco, AK Bar #7710098
Attorneys for the City and Borough of
Juneau, Alaska, a municipal corporation,
and Rorie Watt in his official capacity as
City Manager

HOFFMAN & BLASCO, LLC

Dated: January 30, 2018

By: /s/ Megan J. Costello
Megan J. Costello, AK Bar #1212141

¹ CBJ has separately filed a Motion for Over Length Brief with its Proposed redacted Cross Motion and Opposition, Appendix A, Proposed redacted Statement of Facts, and Proposed redacted Objections to the Plaintiffs Statement of Facts.

Attorneys for the City and Borough of
Juneau, Alaska, a municipal corporation,
and Rorie Watt, in his official capacity as
City Manager

CERTIFICATE OF SERVICE

The undersigned certifies that on January 31, 2018 a true and correct copy of the foregoing **THE CITY AND BOROUGH OF JUNEAU AND RORIE WATT'S SEALED MOTION REQUESTING LEAVE TO FILE PLEADINGS AND EXHIBITS UNDER SEAL** was served on the following parties of record via US mail:

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/s/ Robert P. Blasco

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