

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
WESTERN DIVISION

_____)	
IN RE: DEPUY ORTHOPAEDICS,)	MDL Docket No. 1:10-md-2197-DAK
INC. ASR HIP IMPLANT)	
PRODUCTS LIABILITY)	HONORABLE DAVID A. KATZ
LITIGATION)	
)	
-----)	
THIS DOCUMENT APPLIES TO:)	
)	
ALL CASES)	
)	
_____)	

MOTION FOR LEAVE TO FILE UNDER SEAL THE ASR SETTLEMENT ESCROW AGREEMENT WHICH IS AN EXHIBIT TO PLAINTIFFS' SETTLEMENT OVERSIGHT COMMITTEE'S MOTION FOR APPROVAL OF THE ASR SETTLEMENT ESCROW AGREEMENT

Pursuant to Local Rule 5.2 and Section 23 of the Electronic Filing Policies and Procedures, Plaintiffs' respectfully request leave to file under seal the ASR Settlement Escrow Agreement ("ASR Escrow Agreement"), an exhibit to Plaintiffs' Settlement Oversight Committee's Motion for Approval of the ASR Settlement Escrow Agreement.

The ASR Escrow Agreement contains certain financial information, financial account identifiers, and other sensitive information that should not be publicly available. The inclusion of this information is necessary.

Accordingly, Plaintiffs' respectfully request that this Court issue an Order authorizing Plaintiffs to file under seal the ASR Escrow Agreement, an exhibit to Plaintiffs' Settlement Oversight Committee's Motion for Approval of the ASR Settlement Escrow Agreement.

Dated: May 15, 2014

Respectfully submitted,

ZOLL, KRANZ & BORGESS, LLC,

By: /s/ Michelle L. Kranz

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Plaintiffs' Liaison Counsel

CERTIFICATE OF SERVICE

I hereby certify that a copy of foregoing was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. Parties may access this filing through the Court's system.

Dated: May 15, 2014

/s/ Michelle L. Kranz