

**IN THE UNITED STATES DISTRICT COURT FOR  
THE MIDDLE DISTRICT OF TENNESSEE  
AT NASHVILLE**

<b>IN RE: AREDIA® AND ZOMETA®</b>	)	<b>No. 3:06-MDL-1760</b>
<b>PRODUCTS LIABILITY LITIGATION</b>	)	
<b>(MDL No. 1760)</b>	)	<b>JUDGE CAMPBELL</b>
	)	
<b>This Document Relates To:</b>	)	<b>MAGISTRATE JUDGE BROWN</b>
	)	
<b>ALL CASES</b>	)	

**MOTION FOR LEAVE TO FILE DOCUMENT UNDER SEAL**

Comes the PSC and moves the Court for leave to file under seal. In support of this motion, the PSC would show as follows:

1. The Fee and Expense Assessment Order (DE 2219) (hereinafter “the Order”) requires that the Defendant pay 8% of each gross settlement (6% being subtracted from the attorney’s fees portion and 2% being deemed expense reimbursement).

2. The Order expressly provides in ¶3 “Payment by the Defendant in MDL 1760 Fee and Expense Trust Account of the appropriate assessment amount shall fully discharge Defendant’s obligation under this Order.” (DE 2219).

3. The Order provides that the set aside payments provided therein shall be deposited in the MDL 1760 Fee and Expense Trust Account and held subject to directions of the Court.

4. The PSC in the past has been permitted to file a motion under seal concerning this subject matter and request that it be again permitted to do so.

Respectfully submitted,

FLYNN LAW OFFICE, PLLC

/s/ C. Patrick Flynn  
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*For the PSC*

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing Motion for Leave to File Document under Seal was furnished by the Court's Electronic Filing System to counsel of record in Case No. 3:06-MD-01760 on this 23<sup>RD</sup> day of December 2013.

/s/ C. Patrick Flynn  
C. Patrick Flynn