



IN THE COURT OF COMMON PLEAS OF
CENTRE COUNTY, PENNSYLVANIA
CIVIL ACTION - LAW

MICHAEL J. MCQUEARY
Plaintiff

vs.

**THE PENNSYLVANIA STATE
UNIVERSITY,**
Defendant

: Docket No. 2012-1804
:
: Type of Case: Whistleblower/Defamation/
: Misrepresentation
:
: Type of Pleading: Motion to File
: Documents under Seal
:
: Filed on Behalf of: Plaintiff
:
: Counsel of Record for this Party:
: Elliot A. Strokoff
: PA I.D. Number: 16677
: W. Tim Fleming
: PA I.D. Number: 39563

MICHAEL J. MCQUEARY

Plaintiff

vs.

**THE PENNSYLVANIA STATE
UNIVERSITY,**

Defendant

: IN THE COURT OF COMMON PLEAS

: CENTRE COUNTY, PENNSYLVANIA

: NO. 2012-1804

: CIVIL ACTION

:

: JURY TRIAL DEMANDED

DEBRA C. JAMES
PROthonotary
CENTRE COUNTY, PA

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JOINT MOTION TO FILE EXHIBITS UNDER SEAL

1. On August 21, 2013, the parties in the above captioned matter entered into a Confidentiality Agreement concerning discovery material produced in connection with this case, a true and correct copy of which is Exhibit A in the sealed envelope attached to this Motion.

2. Paragraph 3 of the aforementioned Confidentiality Agreement provides for the filing of discovery material with the Court under seal.

3. Plaintiff is filing a Motion to Compel Defendant's Production of Documents which concerns and refers to Defendant's Third Supplemental Written Response to Plaintiff's First Request for Production of Documents and one discovery deposition.

Accordingly, Plaintiff, with the joinder of Defendant, moves the Court for an Order allowing Plaintiff to file all Exhibits to the Motion to Compel Defendant's Production of Documents under seal.

Respectfully submitted,

FLEMING LAW OFFICE

By: 

W. Tim Fleming

I.D. No. 39563

204 E. Calder Way, Suite 304

State College, PA 16801

(814) 278-5280

DATE: 12/4/14

MICHAEL J. MCQUEARY
Plaintiff

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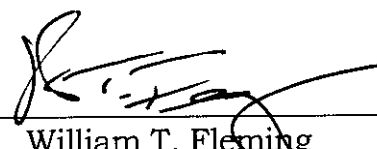
CERTIFICATE OF SERVICE

I, the undersigned, certify that I have this day served a true and correct copy of the foregoing Joint Motion to File Exhibits Under Seal by email and by first-class mail, postage prepaid, on the following person(s):

conradn@whiteandwilliams.com

Nancy Conrad, Esq.
White and Williams LLP
3701 Corporate Parkway, Suite 300
Center Valley, PA 18034

Dated: 12/4/14

By: 
William T. Fleming