





1. Plaintiffs' Response refers to documents and information that have been designated "Confidential" or "Highly Confidential" under the September 11, 2014 Protective Order.
2. Exhibits B, E, F, G, H, K, L, M, N, P, Q, R, and S, to Plaintiffs' Response have been designated "Confidential" or "Highly Confidential" under the Protective Order.
3. Filed simultaneously herewith is a redacted version of Plaintiffs' Response and redacted Exhibits B, E, F, G, H, K, L, M, N, P, Q, R, and S.

WHEREFORE, Plaintiffs respectfully request that the Court enter an Order of the form submitted herewith, sealing the unredacted Response to Penn State's and Pepper Hamilton's Joint Memorandum of Law in Support of Privilege Claims and Exhibits B, E, F, G, H, K, L, M, N, P, Q, R, and S thereto, and directing the Prothonotary to file them under seal.

Date: June 22, 2016

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing PLAINTIFFS' MOTION FOR LEAVE TO FILE UNDER SEAL was served this 22nd day of June, 2016 by first class mail and email to the following:

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
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