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Attorneys for Petitioners U.S. Firearms Company LLC, Eric W. Fisher, and
The National Shooting Sports Foundation, Inc.

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF SANTA CLARA**

U.S. FIREARMS COMPANY LLC, a)
limited liability company; ERIC W.)
FISHER; and THE NATIONAL)
SHOOTING SPORTS)
FOUNDATION, INC., a non-profit)
trade association,)
Petitioners,)
v.)
CITY OF SUNNYVALE; THE)
SUNNYVALE CITY COUNCIL; and)
DOES 1 through 30, inclusive,)
Respondents.)

CASE NO. 113CV257353
**NOTICE OF MOTION AND MOTION BY
PETITIONERS TO SEAL DOCUMENTS
SUBMITTED PURSUANT TO ORDER TO
SHOW CAUSE RE: PRELIMINARY
INJUNCTION**
Date: February 11, 2014
Time: 9:00 a.m.
Dept: 3
Judge: Hon. William J. Elfving
Action Filed: December 9, 2013
Trial Date: None

1 TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

2 NOTICE IS HEREBY GIVEN that on February 11, 2014, at 9:00 a.m., in
3 Department 3 of this Court, located at 161 N. First Street, San Jose CA 95113,
4 Petitioners U.S. Firearms Company LLC ("U.S. Firearms"), Eric W. Fisher, and the
5 National Shooting Sports Foundation, Inc. ("NSSF") will move the Court for an order
6 sealing: (1) Respondents the City of Sunnyvale's and the Sunnyvale City Council's
7 Opposition to Order to Show Cause re: Preliminary Injunction; (2) Exhibits "D" and "E" to
8 the Declaration of Anthony Schoenberg in support of Respondents' Opposition to Order
9 to Show Cause re: Preliminary Injunction; and (3) the Supplemental Declaration of Eric
10 W. Fisher in support of Order to Show Cause re: Preliminary Injunction.

11 The motion will be on the grounds, each and all, that the above-identified
12 materials contain confidential, proprietary, and competitively-sensitive business
13 information subject to a protective order; there is an overriding interest overcoming the
14 right of public access to the business information which supports sealing of the records;
15 a substantial probability exists the overriding interest will be prejudiced if the record is
16 not sealed; the proposed sealing is narrowly tailored; and there is no less restrictive
17 means to achieve the overriding interest.

18 The motion will be based on this notice, the memorandum of points and
19 authorities and declarations of Eric W. Fisher and Robert C. Wright filed and served in
20 support thereof, and on all of the pleadings, papers, and files in the case.

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22 WRIGHT & L'ESTRANGE
Attorneys for Petitioners

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24 Dated: January 8, 2014

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By  _____
Robert C. Wright