

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

ANHEUSER-BUSCH InBEV
SA/NV, *et al.*,

Defendants.

Civil Action No. 13-127 (RWR)
Judge Richard W. Roberts

UNOPPOSED MOTION FOR LEAVE TO FILE UNDER SEAL

Plaintiff United States hereby moves the Court, pursuant to Federal Rule of Civil Procedure 26(c) and Local Civil Rule 5.1(j), for an Order permitting the United States to file Exhibit A and Exhibit D to the Plaintiff's proposed Final Judgment (the "exhibits") under seal. Pursuant to section IV, paragraph 13 of the Stipulated Interim Protective Order (Dkt. No. 20), Plaintiff will file on the public record a redacted copy of the exhibits within six days of the filing of the Notice Regarding Filing of Sealed Material. Plaintiff has consulted with Defendants and with Proposed Settlement Defendant Constellation Brands, Inc., and they do not object to this Motion.

Plaintiff requests that the exhibits be filed under seal because they are or refer to documents or information that Defendants have designated "Confidential Information" pursuant to the Stipulated Interim Protective Order. Exhibit A to Plaintiff's proposed Final Judgment contains Defendants' Stock Purchase Agreement and Membership Interest Purchase Agreement, which describe the terms of the transactions and supply agreements that are the subject of the proposed Final Judgment. Exhibit D to Plaintiff's

proposed Final Judgment contains an agreement setting forth the terms of sale of certain beer distribution rights held by beer distributors owned by Defendant Anheuser-Busch InBev SA/NV. Revealing the terms of the agreements contained in the exhibits may disclose Defendants' confidential commercial information.

Accordingly, Plaintiff respectfully submits this Motion for an Order permitting it to file under seal:

- (1) Exhibit A to the proposed Final Judgment; and
- (2) Exhibit D to the proposed Final Judgment.

A proposed Order is attached hereto.

Dated: April 19, 2013

Respectfully submitted,

FOR PLAINTIFF
UNITED STATES OF AMERICA

/s/ Mary N. Strimel
Mary N. Strimel (D.C. Bar No. 455303)
United States Department of Justice
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CERTIFICATE OF SERVICE

I hereby certify that on the 19th day of April, 2013, I caused electronic copies of the following documents:

1. Exhibit A to the proposed Final Judgment;
2. Exhibit D to the proposed Final Judgment;
3. Notice of Filing Under Seal;
4. Motion for Leave to File Under Seal; and
5. Certificate of Service

to be served on Defendants Anheuser Busch InBev SA/NV, Grupo Modelo, S.A. de C.V., and on Proposed Settlement Defendant Constellation Brands, Inc., on disk via overnight delivery as follows:

For Defendant Anheuser Busch InBev SA/NV:

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