UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA Plaintiff v. UNITED TECHNOLOGIES CORPORATION and GOODRICH CORPORATION Defendants	CASE NO.: 1:12-CV-01230-RC

UNOPPOSED MOTION FOR LEAVE TO FILE PUBLIC COMMENTS UNDER SEAL

Pursuant to LCvR 5.1(j)(1), the United States respectfully submits this motion for leave to file the public comments regarding the Proposed Final Judgment in this case under seal. The United States further moves for leave to file a redacted version of the public comments, which is attached to this motion, to remain on the public docket. The redacted version will also be published in the *Federal Register* and on the website of the United States Department of Justice.[1]

The unredacted version of the comments was filed with the court on February 25, 2013. Subsequently, counsel for defendants United Technologies Corporation and Goodrich Corporation represented that certain attachments to one of the public comments contain materials that the defendants deem confidential and that therefore should be filed under seal.[2] The United

[1] Concurrently with this motion, the United States has filed a motion to excuse *Federal Register* publication of certain attachments to one of the public comments.

[2] On February 26, 2013, after the United States notified the clerk of the court of the defendants' concerns, the comments were temporarily removed from public availability pending a review to determine if they contained

States has no objection to having such materials placed under seal with a redacted version available to the public.

Pursuant to LCvR 7(m), counsel for the United States has discussed this Motion with counsel for the Defendants, who have consented to the motion.

Dated: March 21, 2013

Respectfully submitted
FOR PLAINTIFF UNITED STATES:

Kevin C. Quin /RMW

KEVIN C. QUIN
Attorney
U.S. Department of Justice
Antitrust Division
450 Fifth Street, N.W., Suite 4000
Washington, D.C. 20530
Telephone: (202) 307-0922
Fax: (202) 307-6283
Email: kevin.quin@usdoj.gov

CERTIFICATE OF SERVICE

I, Kevin C. Quin, hereby certify that on March 21, 2013, I caused a copy of the Foregoing **UNOPPOSED MOTION FOR LEAVE TO FILE PUBLIC COMMENTS UNDER SEAL, PROPOSED ORDER, and REDACTED COMMENTS** to be filed in this matter with the Clerk of Court and to be served on the following counsel of record for Defendants United Technologies Corporation and Goodrich Corporation and the Monitoring Trustee:

Counsel for United Technologies Corporation:
Michael H. Byowitz
Wachtell, Lipton, Rosen & Katz
51 West 52nd Street
New York, NY 10019

Wm. Randolph Smith
Robert A. Lipstein
Crowell & Moring LLP
1001 Pennsylvania Avenue, N.W.
Washington, D.C. 20004

Counsel for Goodrich Corporation
Tom D. Smith, Esq.
Jones Day
51 Louisiana Avenue, N.W.
Washington, D.C. 20001-2113

Counsel for Monitoring Trustee ING Financial Markets LLC
Stanley E. Woodward, Jr.
Akin Gump Strauss Hauer & Feld, LLP
1333 New Hampshire Avenue, NW
Washington, DC 20036

Kevin C. Quin /kww

Kevin C. Quin (D.C. Bar #415268)
United States Department of Justice
Antitrust Division, Litigation II Section
450 Fifth Street, N.W., Suite 8700
Washington, D.C. 20530
kevin.quin@usdoj.gov