

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

UNITED STATES OF AMERICA,)	
)	
<i>Plaintiff,</i>)	
)	Civil Action No.1:03-CV-00434 (HHK)
v.)	
)	
SMITHFIELD FOODS, INC.,)	
)	
<i>Defendant.</i>)	
)	

**PLAINTIFF’S MOTION FOR LEAVE TO FILE UNDER SEAL
APPENDIX B TO PLAINTIFF’S MOTION FOR AN ORDER COMPELLING
PRODUCTION OF DOCUMENTS AND ANSWERS TO INTERROGATORIES AND
FOR AN ORDER EXTENDING THE PERIOD FOR JURISDICTIONAL DISCOVERY
AND STATEMENT OF POINTS AND AUTHORITIES**

Plaintiff, United States of America (“Plaintiff”) respectfully moves this Court for the entry of an Order granting Plaintiff the right to file under seal Appendix B to Plaintiff’s Motion for an Order Compelling Production of Documents and Answers to Interrogatories and for an Order Extending the Period for Jurisdictional Discovery (“Appendix B”), and for its reasons relies upon the following:

Pursuant to the Stipulated Protective Order Governing Confidential Information entered by the Court on June 17, 2003 (“Protective Order”), Defendant, Smithfield Foods, Inc., designated pages 4 to 18 of Appendix B to be confidential. In accordance with the Protective Order, such confidential material must be filed under seal. Plaintiff therefore seeks leave to submit Appendix B under seal.

**Statement of Points and Authorities in Support
of Plaintiff's Motion to For Leave to File Under Seal Appendix B**

The Motion is made pursuant to Rule 7, Fed.R.Civ.P., as well as Rule 7.1 and Rule 5.1(j),
L.Civ.R.

Plaintiff respectfully requests that the Court enter an Order Granting the United States the
right to file under seal the attached Appendix B.

Statement of Compliance with L.Cv.R. 7.1 (m)

Given that Appendix B is a document that Defendant designated as confidential pursuant
to the Protective Order entered in this case, there is no disagreement that required narrowing or
discussion, and Defendant would not oppose the motion.

Dated this 3rd day of July, 2003.

Respectfully submitted,
Plaintiff, United States

By _____ “/s/”
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