

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

IRA KLEIMAN, as the personal representative  
of the Estate of David Kleiman, and W&K Info  
Defense Research, LLC

Plaintiffs,

v.

CRAIG WRIGHT

Defendant.

**CASE NO.: 9:18-cv-80176-BB/BR**

**PLAINTIFFS' MOTION TO SEAL**

In advance of today's discovery hearing, Plaintiffs will be filing a Notice of Filing attaching a third Tulip Trust document ("Tulip Trust III") that was not produced under this Court's prior order to produce all documents related to the "blind" tulip trust (ECF No. [166]). Plaintiffs received this document for the first time on January 6, 2020, amongst a production of 428 other documents, without any explanation as to its late disclosure, or even an email pointing out this document had been produced.

Craig has marked this Tulip Trust III document as "Confidential" pursuant to the Stipulated Confidentiality Order. (ECF No. [105-1].) While Plaintiffs do not believe the Tulip Trust III document should be sealed in its entirety, Plaintiffs believe Craig should be afforded the opportunity to propose redactions to the Court.

Accordingly, Plaintiffs make this motion to seal to comply with the Stipulated Confidential Order and the Local Rules of this Court.

WHEREFORE, Plaintiffs request Defendant be given 10 days to provide proposed redactions to the Court.

Dated: January 9, 2020

Respectfully submitted,

*s/ Velvel (Devin) Freedman*

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*Counsel to Plaintiffs Ira Kleiman as Personal  
Representative of the Estate of David Kleiman and  
W&K Info Defense Research, LLC.*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on January 9, 2020, a true and correct copy of the foregoing was filed with CM/ECF, which caused a copy to be served on all counsel of record.

*/s/ Velvel (Devin) Freedman*

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Velvel (Devin) Freedman