	Case 3:16-md-02741-VC Doc	ument 282 Filed 05/0	9/17 Page 1 of 3		
1	William E. Lawler, III (admitted pro hac vice)				
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3	Suite 500 West Washington, DC 20037				
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6	Counsel for Nonparty Jesudoss Rowland				
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8					
9	UNITED STATES DISTRICT COURT				
10	NORTHERN DISTRICT OF CALIFORNIA (SAN FRANCISCO DIVISION)				
11					
12 -	IN RE: ROUNDUP PRODUCTS LIABIL	TY Case No	3:16-md-02741-VC		
13 14	LITIGATION		DL No. 2741		
14		ADMINISTRAT	SUDOSS ROWLAND'S IVE MOTION TO FILE		
16	This document relates to:	UNDER SEAL			
17	ALL ACTIONS	Date: May 25, 20 Time: 2:00 p.m. (
18		Courtroom: 4, 17 ^t Judge: Honorable			
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27	MR. ROWLAND'S MOTION TO FILE UNDER SEAL; Case No. 16-md-2741-VC				
20		DER SEME, Case 110.	10 mu 2771-VC		

PLEASE TAKE NOTICE that nonparty Jesudoss Rowland, pursuant to Civil Local Rules 7-11 and 79-5, files this Administrative Motion to File Under Seal, ECF No. 282 ("Mr. Rowland's Motion to Seal"), portions of Nonparty Jesudoss Rowland's Opposition To Plaintiffs' Motion To Compel Responses From Deponent Jesudoss Rowland, filed on May 9, 2017, ECF No. 282-1 ("Mr. Rowland's Opposition Brief"). Given that Monsanto Company designated information cited and quoted in Mr. Rowland's Opposition Brief as "Confidential" pursuant to the Court's Protective Order, ECF No. 64, Mr. Rowland is required to initially file that information in redacted form. Civ. L.R. 79-5(e); Protective Order, ECF No. 64. This motion is supported by a declaration from William E. Lawler, III, ECF. No. 282-4.

Mr. Rowland seeks to file the following documents in redacted form:

Document	Designating Party	Redactions Sought (page:line)	Rationale
Mr. Rowland's	Monsanto -	Passim	These pages include citations to
Opposition	Confidential		and quotations of Mr.
Brief, ECF No.			Rowland's April 24, 2017
282-1			deposition. Monsanto
			designated the entire deposition
			as "Confidential."

Pursuant to Civil Local Rule 79-5(e) and this Court's Protective Order, ECF No. 64, Monsanto Company must file the appropriate declaration and demonstrate that the designated information is sealable. Assuming Monsanto demonstrates the information is in fact sealable, Mr. Rowland requests this Court grant his Administrative Motion to File Under Seal.

21	Dated: May 9, 2017 R	espectrully Submitted,
22	V	'INSON & ELKINS L.L.P.
23	В	y: /s/ William E. Lawler
24		. <u></u>
25		Villiam E. Lawler, III (admitted <i>pro hac vice</i>) VINSON & ELKINS L.L.P.
26		200 Pennsylvania Ave., NW uite 500 West
27		Vashington, DC 20037
28		
	MR. ROWLAND'S MOTION TO FILE UNDER S	EAL; Case No. 16-md-2/41-VC

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1 2	Telephone: (202) 639-6676 Facsimile: (202) 879-8876 wlawler@velaw.com			
3	Counsel for Nonparty Jesudoss Rowland			
4				
5	CERTIFICATE OF SERVICE			
6 7	I hereby certify that on May 9, 2017, I caused the foregoing document to be electronically filed with the Clerk of the Court for the United States District Court, Northern			
	District of California using the CM/ECF system, which will send notification of such filing to the			
8 9	email addresses on the Electronic Mail Notice List. Also on May 9, 2017, I caused an unredacted version of Mr. Rowland's Opposition Brief to be sent via electronic mail to			
10	TLitzenburg@MillerFirmLLC.com,NMiller@millerfirmllc.com,MMiller@millerfirmllc.com,JTravers@millerfirmllc.com,WCople@Hollingsworthllp.com,andghollingsworth@Hollingsworthllp.com.WCople@Hollingsworthllp.com,and			
11				
12	<u>/s/ William E. Lawler</u> William E. Lawler, III			
13	Counsel for Nonparty Jesudoss Rowland			
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28	2 MR. ROWLAND'S MOTION TO FILE UNDER SEAL; Case No. 16-md-2741-VC			