

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

GRACE MURRAY, AMANDA ENGEN, :
STEPHEN BAUER, JEANNE TIPPETT, :
ROBIN TUBESING, NIKOLE :
SIMECEK, MICHELLE MCOSKER, :
JACQUELINE GROFF, and HEATHER :
HALL, on behalf of themselves and others :
similarly situated, :

Case No. 1:19-cv-12608-WGY

Plaintiffs, :

v. :

GROCERY DELIVERY E-SERVICES :
USA INC. DBA HELLO FRESH, :
Defendants. :

PLAINTIFFS’ MOTION TO IMPOUND, OR FOR LEAVE TO FILE UNDER SEAL

Pursuant to Local Rule 7.2(d), the Plaintiffs Grace Murray, Amanda Engen, Stephen Bauer, Jeanne Tippett, Robin Tubesing, Nikole Simecek, Michelle Mcosker, Jacqueline Groff, And Heather Hall, hereby move for leave to file under seal Exhibit 3 to the Declaration of Stacey Slaughter (“Exhibit 3”). As grounds for this motion, the Plaintiffs state that Exhibit 3 is obtained from a Thomson Reuter’s Peer Monitor report that shows billing rates among AmLaw 100 firms with a New York city office, but that data is proprietary in nature to Thomson Reuters, and the firm’s received permissions to use the data limit the ability to share it publicly. Thus, the Plaintiffs request to file Exhibit 3 under seal.

LOCAL RULE 7.1(A)(2) CERTIFICATION

Counsel for the Plaintiffs met and conferred with counsel for HelloFresh and counsel for Ms. McDonald regarding this motion. Counsel for HelloFresh does not oppose this motion. Counsel for Ms. McDonald did not respond. Granting this motion will not prejudice any party

because this Court can make its determination on Plaintiffs' papers without Exhibit 3, and Exhibit 3 merely augments Plaintiffs' submission.

WHEREFORE, Plaintiffs respectfully request that this Court: (1) grant Plaintiffs' motion to impound, or for leave to file under seal with the Court an unredacted copy of Exhibit 3 to the Declaration of Stacey Slaughter ("Exhibit 3"); (2) maintain Exhibit 3 under seal in the Clerk's Office for the duration of this lawsuit; (3) not scan Exhibit 3 into the ECF system; and (4) destroy Exhibit 3 at the conclusion of this action.

By Counsel,

/s/ Stacey P. Slaughter (Pro Hac Vice)
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Dated: June 1, 2021

CERTIFICATE OF SERVICE

I hereby certify that on June 1, 2021, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will automatically send notification to all attorneys of record.

/s/ Stacey P. Slaughter
Stacey P. Slaughter