

IN THE CIRCUIT COURT
THIRD JUDICIAL CIRCUIT
MADISON COUNTY, ILLINOIS

HOLIDAY SHORES SANITARY DISTRICT; CITY OF)	
CARLINVILLE, ILLINOIS; CITY OF FLORA, ILLINOIS;)	
CITY OF FAIRFIELD, ILLINOIS; CITY OF HILLSBORO,)	
ILLINOIS; AND CITY OF MATTOON, ILLINOIS;)	
individually and on behalf of all others similarly)	
situated,)	
)	
Plaintiffs,)	
)	
v.)	Cause No. 04-L-710
)	
SYNGENTA CROP PROTECTION, INC., AND)	
GROWMARK, INC.,)	
)	
Defendants.)	

PLAINTIFF'S MOTION TO FILE EXHIBIT UNDER SEAL

Come now Plaintiffs, HOLIDAY SHORES SANITARY DISTRICT, *et al.*, by and through their undersigned attorneys, and for their motion for to file exhibit to their motion for a protective order under seal, state:

1. On August 31, 2009, the Court entered a protective order, which governs the use and dissemination of all information, documents, or materials that are produced in this action and designated as "confidential." *See Protective Order filed August 31, 2009.* Under the protective order, "confidential information" may only be disclosed specifically delineated individuals. ¶6. When including "confidential information" as part of a court filing, the parties must file such information under seal in accordance with the applicable Local Rules. ¶9

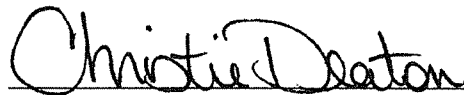
2. Plaintiffs referenced the June 9, 2011, deposition of Sherry Ford as Exhibit 6 to their Plaintiffs' Reply to Defendant Syngenta Crop Protection, LLC's Response to Plaintiffs' Motion for a Protective Order regarding Sherry Ford – Related Confidential Documents, portions of which have been designated as “Confidential” under the protective order.

3. Plaintiffs file this motion to this deposition under seal to comply with their obligations under the protective order entered on August 31, 2009.

Wherefore, Plaintiffs ask this Court allow it to file their Exhibit 6 under seal.

Respectfully submitted,

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SYNGENTA CROP PROTECTION, INC., AND)
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Defendants.)

CERTIFICATE OF SERVICE

The undersigned certifies that true copies of the Plaintiff's Motion to File Exhibit under Seal were served upon the attorneys of record for the defendants in this cause via United States mail, by enclosing said copy in an envelope addressed to said attorneys at his/her address as disclosed by the pleadings on file in this cause and by depositing said envelope in a U.S. Post Office mailbox on this 20th day of July, 2011.

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