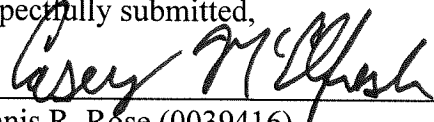


IN THE COURT OF COMMON PLEAS  
CUYAHOGA COUNTY, OHIO  
DIVISION OF PROBATE

ARTHUR P. DUECK, *et al.*, ) CASE NO. 2012 ADV 179424  
 )  
Plaintiffs, )  
 )  
vs. ) JUDGE ANTHONY J. RUSSO  
 )  
 )  
THE CLIFTON CLUB COMPANY, *et al.*, ) **PLAINTIFFS' MOTION TO FILE**  
 ) **EXHIBITS UNDER SEAL INSTANTER**  
Defendants. )

Pursuant to the parties' October 16, 2013 Stipulated Protective Order ("Protective Order"), Plaintiffs' move this Court for an order permitting the filing of Exhibits 11, 13, 14, and 15 to the Reply Brief in Support of Plaintiffs Arthur P. Dueck's, Todd Gilmore's, Nancy Binder's, and William R. Keller's, Putative Plaintiffs Rhonda Loje's and Jeffrey Mansell's, and Defendant Dennis F. Butler's Motion to Remove the Clifton Park Trustees under seal. Copies of the forgoing exhibits are sealed in an envelope which accompanies this Motion. Under Section 6 of the Protective Order, the parties are required to file documents designated as confidential under seal. Although the Trustees have publicly filed several documents designated as confidential pursuant to the Protective Order (*see* Trustees' Opp. Exs. D-P), the Plaintiffs, out of an abundance of caution, seek to preserve the confidentiality of Exhibits 11 and 13-15, which were designated as confidential by the Plaintiffs, Club, or the Trustees. Accordingly, the Plaintiffs respectfully request that the Court grant the forgoing Motion.

Respectfully submitted,



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**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing *Motion to File Exhibits Under Seal Instante* has been served by electronic and/or US mail on December 24, 2014 upon the following:

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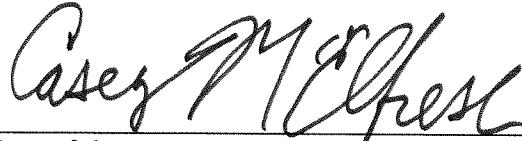
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A handwritten signature in black ink, appearing to read "Casey M. Oliver". The signature is written in a cursive style and is positioned above a horizontal line.

One of the Attorneys for Plaintiffs