

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION

OXEBRIDGE QUALITY RESOURCES
INTERNATIONAL, LLC, and
CHRISTOPHER PARIS, individually,

Plaintiffs,

CASE NO.: 8:15-CV-11-T-17TBM

vs.

MARC TIMOTHY SMITH, individually,
and d/b/a CAYMAN BUSINESS SYSTEMS,

Defendants.

PLAINTIFFS' MOTION TO SEAL

COMES NOW the plaintiffs, OXEBRIDGE QUALITY RESOURCES INTERNATIONAL, LLC and CHRISTOPHER PARIS (cumulatively "plaintiffs" or "PARIS") by and through their undersigned attorney, and file this Motion to Seal, and states as follows:

1. The parties reached a Mediation Settlement Agreement in this action on June 5, 2015.
2. Plaintiffs seek to move for Breach of Mediation Settlement Agreement and request leave to file such notice under seal because said Mediation Settlement Agreement contained a confidentiality provision that prevents the parties from disclosing the settlement publicly, subject to exceptions, including, ". . . this agreement may be disclosed to the above-captioned Court for enforcement purposes or as may be required by Court Order, subpoena, or judicial process."
3. Plaintiffs request this Honorable Court to enter an Order for the Clerk of the Court to file the following documents under seal:

- A. Plaintiff's Motion to Seal;
- B. Confidential Mediation Settlement Agreement dated June 5, 2015; and
- C. Plaintiffs' Verified Second Notice of Defendants' Breach of Mediation Settlement Agreement and Joint Stipulation on Injunction, Motion to Compel Compliance with Injunction, Motion for Money Damages, and Motion for Attorney's Fees.

WHEREFORE, plaintiffs, **OXEBRIDGE QUALITY RESOURCES INTERNATIONAL, LLC** and **CHRISTOPHER PARIS**, hereby request an Order of this Court, pursuant to Local Rule 1.09, allowing the introduction of documents under seal for as long as this Court deems reasonable, and that the rights of the parties be determined without public disclosure of the following enumerated documents:

- A. Plaintiff's Motion to Seal;
- B. Confidential Mediation Settlement Agreement dated June 5, 2015; and
- C. Plaintiffs' Verified Second Notice of Defendants' Breach of Mediation Settlement Agreement and Joint Stipulation on Injunction, Motion to Compel Compliance with Injunction, Motion for Money Damages, and Motion for Attorney's Fees.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served on all parties receiving electronic notification via the CM/ECF filing system as of this 29 day of July 2015.

CERTIFICATE OF GOOD FAITH

The undersigned certifies that a good faith effort has been made to confer with counsel for defendants to resolve this matter and that the attempt has been unsuccessful.

Respectfully submitted by:

WILLIAM R. WOHSIFER, PA

By: /s/ William R. Wohlsifer

William R. Wohlsifer, Esquire

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