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**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF UTAH, CENTRAL DIVISION**

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In re:

VIDANGEL, INC.,

Debtor.

**Case No. 17-29073**

Chapter 11

Judge Kevin R. Anderson

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**MOVANTS' MOTION FOR LEAVE TO FILE UNDER SEAL PURSUANT TO  
DISTRICT OF UTAH LOCAL CIVIL RULE 5-3(B)(2)(C)(i)**

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Disney Enterprises, Inc., Lucasfilm Ltd. LLC, Twentieth Century Fox Film Corporation, Warner Bros. Entertainment Inc., MVL Film Finance LLC, New Line Productions, Inc. and Turner Entertainment Co. (collectively, “Movants”), through counsel, pursuant to District of Utah Local Civil Rule 5-3(b)(2)(C)(i),<sup>1</sup> respectfully submit this motion for leave to file, provisionally under seal, the following documents identified on Movants’ Evidentiary Hearing Exhibit List:<sup>2</sup>

1. VidAngel internal workflow technical document (Cal. Dkt. 33, Ex. C to Schulman Decl. ISO Mot. for Prelim. Inj., filed August 23, 2016).
2. VidAngel internal technical instructions document (Cal. Dkt. 33, Ex. D to Schulman Decl. ISO Mot. for Prelim. Inj., filed August 23, 2016).
3. Neal Harmon Rule 30(b)(6) deposition exhibit 38, email from Josh Jackson to Neal Harmon, dated February 19, 2015 (Cal. Dkt. 33, Ex. DD to Ehler Decl. ISO Mot. for Prelim. Inj., filed August 23, 2016).
4. Neal Harmon Rule 30(b)(6) deposition exhibit 21, VidAngel Board Meeting, dated January 9, 2015 (Cal. Dkt. 33, Ex. V to Ehler Decl. ISO Mot. for Prelim. Inj., filed August 23, 2018).
5. Neal Harmon Rule 30(b)(6) deposition exhibit 22, compilation of emails (Cal. Dkt. 33, Ex. W to Ehler Decl. ISO Mot. for Prelim. Inj., filed August 23, 2016).

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<sup>1</sup> Federal Rules of Bankruptcy Procedure 9013 and 9037(d) and District of Utah Bankruptcy Court Local Rule 5003-2(c) generally authorize the sealing of documents.

<sup>2</sup> Movants are concurrently lodging electronic and hard copies of these documents with the Court pursuant to its August 29, 2018 Order Setting Supplemental Briefing Deadline and Final Hearing on Motion for Relief from the Automatic Stay Pursuant to 11 U.S.C. § 362(d).

6. Neal Harmon Rule 30(b)(6) deposition exhibit 23, email from Neal Harmon to Paul Ahlstrom and Dalton Wright, dated September 29, 2015 (Cal. Dkt. 33, Ex. X to Ehler Decl. ISO Mot. for Prelim. Inj., filed August 23, 2016).

7. Neal Harmon Rule 30(b)(6) deposition exhibit 26, VidAngel Investor Presentation, dated November 2015 (Cal. Dkt. 33, Ex. Y to Ehler Decl. ISO Mot. for Prelim. Inj., filed August 23, 2016).

8. VidAngel's Litigation Budget for Trial, VID000011-Confidential, produced by VidAngel on October 9, 2018.

These documents have been designated as confidential by Debtor, VidAngel, Inc. ("VidAngel"). Apart from VidAngel's litigation budget, the other seven documents were designated as "confidential" or "highly confidential" in the California Action pursuant to the protective order in that case. *See Disney Enters., Inc. v. VidAngel, Inc.*, No. 16-cv-4109-AB (PLAx) (C.D. Cal.) ("California Action"), Dkt. 23, Protective Order, entered Aug. 19, 2016. Those documents were ordered filed under seal in the California Action. *See id.* Dkt. 32, Order Regarding Pls.' Application to File Under Seal, entered Aug. 23, 2016.

Movants take no position on whether these documents merit protection before this Bankruptcy Court. On October 4, 2018, Movants notified VidAngel that they planned to designate certain documents that were sealed in the California Action as exhibits for the hearing on Movants' Motion for Relief from the Stay. Counsel for VidAngel represented that it would review the documents to determine if it would seek protection from disclosure. Pursuant to District of Utah Local Rule 5-3(b)(2), VidAngel has seven days to file a motion for leave to file under seal requesting confidential treatment.

DATED this 10th day of October.

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/s/ Michael R. Johnson  
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*Attorneys for the Movants*

**CERTIFICATE OF SERVICE**

I hereby certify that on October 10, 2018, I electronically filed the foregoing **MOVANTS' MOTION FOR LEAVE TO FILE UNDER SEAL PURSUANT TO DISTRICT OF UTAH LOCAL CIVIL RULE 5-3(B)(2)(C)(i)** with the Clerk of Court using the CM/ECF system, which sent notification of such filing to the electronic filing users in this case as follows:

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