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Attorneys for VidAngel, Inc.

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

In re:

VIDANGEL, INC.,

Debtor.

Case No. 17-29073

Chapter 11

Judge Kevin R. Anderson

EX PARTE MOTION TO FILE EXHIBIT UNDER SEAL

VidAngel, Inc., debtor and debtor-in-possession in the above-captioned chapter 11 case, seeks authority to file an unredacted version of Exhibit A to its Motion to Employ Call & Jensen as Special Counsel Under Sections 327(e) and 328(a) of the Bankruptcy Code (docket #277).

The Debtor maintains that the limited redactions in Exhibit A protect VidAngel's litigation strategy, confidential research, and commercial information. Such interests meet the standard for the protection that the Debtor seeks under § 107(b) of the Bankruptcy Code:

(b) on request of a party in interest, the bankruptcy court shall, and on the bankruptcy court's own motion, the bankruptcy court may—

- (1) Protect an entity with respect to a trade secret or confidential research, development, or commercial information

The Debtor requests that the Court grant this *ex parte* motion by authorizing the filing of Exhibit A to the Employment Application under protective seal.

Dated February 15, 2019

/s/ Michael R. Brown

Michael R. Brown
PARSONS BEHLE & LATIMER
Attorney for the Debtor

PROOF OF SERVICE

I hereby certify that on this 15th day of January 2019, I electronically filed the foregoing **EX PARTE MOTION TO FILE EXHIBIT UNDER SEAL** as follows:

I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which sent notification of such filing to the following:

- Laurie A. Cayton tr laurie.cayton@usdoj.gov,
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/s/ Michael R. Brown

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