UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION

CASE NO.: 1:19-cv-21724-BLOOM/MCALILEY

HAVANA DOCKS CORPORATION,

Plaintiff,

vs.

CARNIVAL CORPORATION,

Defendant.
_____ /

HAVANA DOCKS' UNOPPOSED MOTION FOR LEAVE TO FILE UNREDACTED MOTION TO COMPEL (D.E. 234) AND EXHIBITS UNDER SEAL

Pursuant to Local Rule 5.4 of the Southern District of Florida and the protective order governing this case (ECF No. 229), Plaintiff Havana Docks Corporation ("Havana Docks") moves unopposed for leave to file under seal an unredacted version of its motion to compel production of evidence withheld under the attorney-client privilege and work product doctrine and accompanying exhibits (the "Motion," ECF No. 234).

In an abundance of caution, Havana Docks redacted a portion of its publicly filed Motion related to the subject matter of an email the Court previously required to be filed under seal. The exhibits to the Motion are deposition transcripts and documents that have been designated confidential by Carnival.

Havana Docks takes no position on the duration of any sealing of these records.

Pursuant to Local Rule 7.1(a)(3)(A), the undersigned has conferred with Carnival regarding the relief sought in this motion, and was advised that Carnival does not oppose this motion.

Dated: March 24, 2021.

Respectfully submitted,

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Attorneys for Plaintiff Havana Docks Corp.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was filed with the Clerk of the Court. I also certify that the foregoing document is being served this 24th day of March, 2021, on all counsel of record or pro se parties either via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.

By: s/ Roberto Martínez
Roberto Martínez

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[PROPOSED] ORDER GRANTING
PLAINTIFF'S UNOPPOSED MOTION FOR LEAVE TO
FILE UNREDACTED MOTION TO COMPEL AND EXHIBITS UNDER SEAL

Before the Court is Plaintiff Havana Docks Corporation's unopposed motion for leave to file unredacted motion to compel and exhibits under seal (the "Motion," ECF No. __). Having considered the Motion and the record in this case, the Court **grants** the Motion (ECF No. ___). Havana Docks may file an unredacted version of its motion to compel and exhibits under seal.

Done and ordered, in Chambers, at Miami, Florida on March ____, 2021.

_____
Hon. Chris McAliley
United States Magistrate Judge