

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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: IN RE : MDL No. 1409  
: : Master File 21-95  
: CURRENCY CONVERSION FEE :  
: ANTITRUST LITIGATION :  
: :  
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: THIS DOCUMENT RELATES TO: :  
: :  
: ALL ACTIONS :  
: :  
: :  
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**MOTION TO FILE UNDER SEAL  
EXHIBITS K, L, M AND N TO THE AFFIDAVIT OF  
EDWARD J. RADETICH, JR., C.P.A. REGARDING CLAIMS ADMINISTRATION**

Pursuant to the requirements of Paragraph 18(b) of the Confidentiality Order in *In re Currency Conversion Fee Antitrust Litigation*, Plaintiffs move for entry of an order granting leave to file under seal Exhibits K, L, M and N to the Affidavit of Edward J. Radetich, Jr., C.P.A. Regarding Claims Administration (collectively, the “Exhibits;” individually as “Exhibit \_\_”).

1. The Exhibits contain sensitive personal information of claimants who participated in the settlement in *In re Currency Conversion Fee Antitrust Litig. (“CCF I”)*, MDL No. 1409, Master File M21-95. Exhibits K, L and M are DVDs containing information on the refund amount for each individual claimant for each *CCF I* claim option: (i) Exhibit K contains the data for all Option 1 claims; (ii) Exhibit L contains the data for all Option 2 claims; and (iii) Exhibit M contains the data for all Option 3 and Agency/Company claims. Exhibit N is a DVD containing the data for all the rejected claims.

2. Because these exhibits contain sensitive personal information for the listed claimants, Plaintiffs are submitting the DVDs under seal to the Court, in accord with Rule 5.2 of the Federal Rules of Civil Procedure.


3. As directed by Paragraph 18(b) of the Confidentiality Order, should the Court direct that these materials be filed under seal, Plaintiffs will file sealed copies of the DVDs with the Clerk of the Court. The originals of these materials are being submitted to the Honorable William H. Pauley, III.

4. Also, because these exhibits contain competitively sensitive information concerning which cards claimants hold, the DVDs are not being served on Defendants.

WHEREFORE, Plaintiffs respectfully submit this motion pursuant to the Confidentiality Order.

DATED: September 14, 2011

Respectfully submitted,

  
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