IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

FEDERAL TRADE COMMISSION,	*	
Plaintiff,	*	
v.	*	Civil Case No. GLR -20-cv-03538
RagingBull.com, LLC., *et al.*,	*	
Defendants.	*	

* *

MOTION TO FILE UNDER
TEMPORARY SEAL

Temporary Receiver Peter E. Keith, pursuant to Local Rule 105.11, respectfully moves for leave to file under temporary seal his Response to Emergency Motions of Defendants RagingBull.com, LLC, Jeffrey M. Bishop, Jason Bond, Kyle W. Dennis, Winston Corp., & Winston Research Inc. for Release of Funds [ECF 117], as well as the sole exhibit accompanying that response.

On January 5, 2021, Defendants Bishop, Bond, and RagingBull.com filed an Emergency Motion for Clarification of the Temporary Restraining Order [ECF 107]. The next day, Bishop and Bond filed a Motion for Increased Use of Individual Assets for Living Expenses [ECF 110]. The following day, January 7, 2021, Defendants Kyle Dennis, Winston Corp., and Winston Research, Inc. filed a brief, joining in part Bishop's, Bond's, and RagingBull.com's motion for clarification

[ECF 112]. Today, the Temporary Receiver filed, under seal, his response to these filings [ECF 117].

Defendants' filings seek a release of funds to pay for personal expenses and their defense of this litigation. Defendants raise numerous issues relating to their finances, living expenses, and legal defense costs. The Temporary Receiver's response seeks to provide the Court information that the Court may find helpful and that otherwise may not be presented. In preparing his response, the Temporary Receiver relied on analyses conducted by the forensic accounting firm he engaged, Verity, LLC. Verity, in turn, relied on internal financial information provided by RagingBull.com, LLC and the individual Defendants.

The Temporary Receiver neither believes nor contends that the information contained in his response [ECF 117] is confidential or appropriately shielded from public view. Counsel for Bishop, Bond, and RagingBull.com, though, have asserted that unspecified financial information of their clients should be maintained as confidential. The parties have not agreed upon a stipulated confidentiality agreement and protective order.

The Temporary Receiver considered alternatives to this motion and determined they would not be sufficient. Given the expedited briefing schedule and the lack of a confidentiality stipulation and protective order, sealing this response is the most prudent course. While the Temporary Receiver considered redacting portions of the response that expressly state financial information of

RagingBull.com and Messrs. Bishop, Bond, and Dennis, the response's entire analysis is dependent on this information and so potentially subject to redaction.

The Temporary Receiver favors disclosure of the materials in this response and believes a fourteen-day seal is appropriate to provide important information to the Court while also ensuring an opportunity for Defendants to move the Court for a permanent seal.

Accordingly, in the interest of preserving the potential confidentiality of Defendants' financial information pending resolution of any disputes over confidentiality, the Temporary Receiver respectfully requests that the Court seal the Temporary Receiver's response [ECF 117] for fourteen days. Should Defendants seek to maintain the confidentiality of this information, they may move to extend the seal during this time. If Defendants do not move to extend the seal, it would expire by its own terms fourteen days from the date of this motion.

WHEREFORE, the Temporary Receiver respectfully requests that the Court grant this Motion and place under fourteen-day seal his Response to Emergency Motions of Defendants RagingBull.com, LLC, Jeffrey M. Bishop, Jason Bond, Kyle W. Dennis, Winston Corp., & Winston Research Inc. for Release of Funds [ECF 117], as well as the sole exhibit accompanying that response.

Respectfully submitted,

GALLAGHER EVELIUS & JONES LLP

/s/ Mark S. Saudek

Mark S. Saudek (Fed. Bar #23963)
Meghan K. Casey (Fed. Bar #28958)
218 North Charles Street, Suite 400
Baltimore MD 21201
phone (410) 727-7702
fax (410) 468-2786
msaudek@gejlaw.com
mcasey@gejlaw.com

Counsel to Receiver Peter E. Keith

Date: January 11, 2020