UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

FEDERAL TRADE COMMISSION, STATE OF CALIFORNIA, STATE OF ILLINOIS, STATE OF MINNESOTA, STATE OF NEW YORK, STATE OF WASHINGTON and STATE OF WISCONSIN, *Plaintiffs*, v. AMGEN INC. and HORIZON THERAPEUTICS PLC, *Defendants*.	Case No. 1:23-cv-03053 Judge John F. Kness

DEFENDANTS' UNOPPOSED MOTION FOR LEAVE TO FILE DOCUMENTS UNDER SEAL

Pursuant to Local Rule 26.2 Defendants Amgen Inc. ("Amgen") and Horizon Therapeutics plc ("Horizon" and, together with Amgen, "Defendants") respectfully move, on the following grounds, to file under seal their memorandum in opposition to Plaintiff's motion for preliminary injunction, along with the supporting exhibits, (collectively, the "preliminary injunction response materials"):

1. On May 19, 2023, the Court entered an Interim Confidentiality Order. (Dkt. 25.) Paragraph 7 of that Order prohibits disclosure of "Confidential Material" except as specifically authorized. Paragraph 9 of that Order requires any party intending

to file any pleading, motion, exhibit or other paper containing "Confidential Material" to file a motion to seal the information.

2. Defendants' opposition to Plaintiff's motion for preliminary injunction is due August 21, 2023. (Dkt. 58.)

3. The preliminary injunction response materials include information designated "Confidential," including potentially sensitive business information.

4. Defendants respectfully request authorization to file unredacted versions of the preliminary injunction response materials under seal so as not to prejudice the confidentiality claims of the parties or of third parties who have produced documents in discovery.

5. Defendants will promptly file a redacted, public version of the memorandum in opposition to the motion for preliminary injunction after conferring with Plaintiffs regarding appropriate redactions.

6. Counsel for Plaintiff Federal Trade Commission has advised that Plaintiffs do not oppose this motion.

WHEREFORE, Defendants respectfully request that the Court enter an order authorizing them to file the preliminary injunction response materials under seal.

Dated: August 17, 2023

Respectfully submitted,

/s/ David R. Marriott

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