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. 23-cv-03053

PLAINTIFF FEDERAL TRADE COMMISIONS'S UNOPPOSED MOTION FOR AN ORDER DIRECTING THE FILING OF PLAINTIFFS' MEMORANDUM OF LAW AND ACCOMPANYING EXHIBITS

Plaintiff Federal Trade Commission ("FTC") respectfully moves the Court for an order, pursuant to Rules 5 and 7(b) of the Federal Rules of Civil Procedure and Local Civil Rules 5.8 and 26.2, directing the Clerk of the Court to file under seal, until further order, Plaintiffs'

Memorandum of Law in Support of their Motion for a Preliminary Injunction and Accompanying Exhibits.

Pursuant to the Court's Interim Confidentiality Order, ECF No. 25, Defendants and certain nonparties have designated materials contained in Plaintiff's Memorandum of Law and Accompanying Exhibits as reflecting and containing CONFIDENTIAL information, including potentially sensitive business information. Accordingly, the Commission respectfully requests that the Court enter the proposed order granting leave to file the foregoing documents under seal until further order. The Commission consulted with Defendants in this matter and can represent that the motion to seal is unopposed. The Commission will also file a public, redacted version of its Memorandum of Law as soon as possible, and after Defendants have had an opportunity to review and approve of proposed redactions.

Dated: July 8, 2023

Respectfully submitted,

/s/ Nathan Brenner
Nathan Brenner (Illinois Bar 6317564)
Stephen A. Mohr
Jordan S. Andrew
Federal Trade Commission
Bureau of Competition
600 Pennsylvania Avenue, NW
Washington, DC 20580
Tel.: 202-326-2314
Email: nbrenner@ftc.gov

Counsel for Plaintiff Federal Trade Commission

Rachel F. Sifuentes
Midwest Regional Office
Federal Trade Commission
230 S. Dearborn St., Room 3030
Chicago, IL 60604

Local Counsel for Plaintiff Federal Trade Commission