

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
(Northern Division)**

LEONA FAREN,

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Plaintiff,

*

v.

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Case No. 1:23-cv-01270-MJM

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ZENIMAX ONLINE STUDIOS, LLC

And

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AP BENEFIT ADVISORS, LLC

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Defendants.

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**ZENIMAX ONLINE STUDIOS LLC’S MOTION TO SEAL
EXHIBITS A AND D TO MOTION TO DISMISS AND MOTION TO STRIKE**

Defendant ZeniMax Online Studios LLC (“ZOS”), through its undersigned counsel and pursuant to Local Rule 105.11, hereby moves for leave to file under seal Exhibits A and D to Defendant’s Motion to Dismiss and Motion to Strike Plaintiff Leona Faren’s Complaint (“Motion”). In support thereof, ZOS state as follows:

1. Exhibit A to the Motion is a confidential Separation Agreement between Plaintiff Leona Faren (“Ms. Faren”) and her former employer, ZeniMax Media Inc. (“ZMI”).

2. As set forth in Exhibit A, ZMI and Ms. Faren agreed to maintain the confidentiality of the Separation Agreement. Specifically, it states, “this Agreement, its contents and all information pertaining to it are to remain confidential.” *See* Exhibit A at page 5.

3. Additionally, Exhibit D contains certain medical and/or personal health information relating to Ms. Faren. In a further effort to protect her privacy, ZOS has redacted information not relevant to the Motion and is seeking to file the entire document under seal.

WHEREFORE, ZOS respectfully requests that this Motion be GRANTED and that Exhibits A and D to Defendant's Motion to Dismiss and Motion to Strike Plaintiff's Complaint be SEALED.

A proposed Order follows.

Respectfully submitted,

/s/ Stephanie K. Baron

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Attorneys for ZeniMax Online Studios LLC

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on July 21, 2023, a copy of the foregoing and Proposed Order was served on counsel of record via this Court's CM/ECF system.

/s/ Stephanie K. Baron

Stephanie K. Baron