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To: [Court Of Appeals Filings](#)
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Subject: RE: Appellants" opening brief, designation of matter, and joint motion to seal in Appellate Case No. 2021-000648
Date: Wednesday, August 18, 2021 6:21:41 PM
Attachments: imagebca4cf.PNG
imageed01c6.PNG
image5aa6b2.PNG
image034335.PNG
Unredacted Appellants" Opening Brief (Appellate Case No. 2021-000648).pdf

Dear Madam Clerk and Counsel,

As indicated in my email below, please find attached an unredacted version of Appellants' opening brief, with the yellow highlighting indicating the portions that were redacted from Appellants' brief attached to the email below. Again, we would respectfully ask that this not be made publicly available. Best,

Todd

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From: Carroll, Todd
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<WBD.SCASBESTOS@wbd-us.com>; Stout, Deborah <Debbie.Stout@wbd-us.com>

Subject: Appellants' opening brief, designation of matter, and joint motion to seal in Appellate Case No. 2021-000648

Dear Madam Clerk,

Please find attached for filing the following materials for *Protopapas, as Receiver for Starr Davis, v. Travelers*, Appellate Case No. 2021-000648:

- (1) Appellants' Opening Brief (redacted)
- (2) Appellants' Designation of Matter
- (3) Joint Motion to File Under Seal

By copy of this email, we are serving the same on counsel for the Respondents. We will send a check for the filing fee for the joint motion to the Court within five days.

For reference, the Appellants' Opening Brief that is attached hereto for filing contains "blacked out" portions that conceal information in the brief that was redacted at the trial level, and that is the subject of the attached joint motion to seal. We respectfully request that the attached version be the brief that is available for view on C-Track.

By separate email, we will provide the Court and Respondents with a version of this brief that contains yellow highlighting where the blacked-out portions currently are, so that the Court and counsel can see what Appellants have proposed to redact. We would ask that the unredacted version not be made available to the public.

If the Court has difficulty opening any of the attachments, please do not hesitate to call on us.
Best,

Todd