

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

FEDERAL ENERGY REGULATORY COMMISSION,)	
)	
Plaintiff,)	Civil Action No. 3:15-cv-00452 (MHL)
v.)	
)	
POWHATAN ENERGY FUND, LLC, <i>et al.</i>)	
)	
Defendants.)	
)	

**PLAINTIFF FEDERAL ENERGY REGULATORY COMMISSION’S MOTION FOR
LEAVE TO FILE UNDER SEAL**

Plaintiff Federal Energy Regulatory Commission (“FERC”) moves, pursuant to Local Civil Rule 5(C), for entry of the attached Proposed Order permitting FERC to file under seal its Brief in Support of Motion for Leave to Amend Complaint to Add Relief Defendants and Exhibits B through F thereto. Exhibits B through F have been designated by Defendant Powhatan Energy Fund, LLC, as “Confidential” under the Consent Protective Order issued by the Court on March 22, 2021 (ECF No. 170), and the Brief itself quotes and discusses these Exhibits. FERC is thus required to request their filing under seal.

Pursuant to Local Civil Rule 5(C), Powhatan is required to file a memorandum in support of its desire for the documents to be sealed. FERC believes the documents, though designated “Confidential,” should be made part of the public record and anticipates requesting their unsealing at a later time.

Respectfully Submitted,

/s/ Kevin Dinan

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Dated: December 3, 2021

CERTIFICATE OF SERVICE

I hereby certify that on December 3, 2021, I filed the foregoing motion with the Clerk's Office, using the CM/ECF system, which will send a notification of such filing to counsel of record in this matter.

/s/ Kevin Dinan
Kevin Dinan