

**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,	)	
HOULIAN "ALAN" CHEN,	)	
HEEP FUND, INC., and	)	
CU FUND, INC.	)	
	)	
Defendants.	)	
	)	

**NOTICE OF FILING MOTION TO SEAL**

Defendants Powhatan Energy Fund, LLC, Houlian "Alan" Chen, HEEP Fund, Inc., and CU Fund, Inc. (collectively, "Defendants"), by and through counsel, and pursuant to Local Civil Rules 5(B) and 5(C) of the Local Rules for the United States District Court for the Eastern District of Virginia, hereby give notice of filing their Motion for Leave to File Under Seal Portions of Defendants' Response in Opposition to the Market Monitor's Motion to Quash and for Protective Order. Portions of Defendants' Response in Opposition to the Market Monitor's Motion to Quash and for Protective Order are being filed under seal pursuant to section 8.2 of the Consent Protective Order entered by the Court on March 22, 2021 (ECF No. 170).

Any party or non-party may submit a memorandum in support of or in opposition to the motion to seal within seven (7) days after the filing of the motion to seal. Any person objecting to the motion must file an objection with the Clerk within seven (7) days after the filing of the motion to seal. If no objection is filed in a timely manner, the Court may treat the motion as uncontested. Defendants note that they are filing this motion for leave to file under seal because others have

designated certain materials as confidential. As such, Defendants understand that the designating parties must file responses providing the information required by Local Civil Rule 5(C).

Respectfully Submitted,

/s/ Patrick R. Hanes

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Dated: June 25, 2021

/s/ Robert W. Warnement

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*Counsel for Houlian Chen, HEEP Fund, Inc.,  
and CU Fund, Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that on June 25, 2021, I filed the foregoing notice 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/ Patrick R. Hanes

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