

**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.)	
)	

PLAINTIFF FEDERAL ENERGY REGULATORY COMMISSION’S NOTICE OF MOTION TO SEAL

PLEASE TAKE NOTICE that Plaintiff Federal Energy Regulatory Commission (“FERC”) in accordance with Local Rule 5(C) and the Court’s Order dated August 30, 2021 (ECF No. 223), has moved the Court for leave to file under seal its response to Defendant Powhatan Energy Fund LLC’s Supplemental Submissions regarding Williams Mullen’s Motion for Leave to Withdraw (ECF No. 207). The grounds in support of the motion are set forth in FERC’s non-confidential Memorandum in Support of the Motion to Seal.

Before the Court may seal documents, the requesting party “must give public notice of the request to seal and allow interested parties a reasonable opportunity to object.” *Ashcraft v. Conoco, Inc.*, 218 F.3d 282, 288 (4th Cir. 2000). In compliance with Local Rule 5 of the Rules of the Eastern District of Virginia and *Ashcraft*, FERC hereby provides the following notice:

Interested parties and non-parties may submit memoranda in support of or in opposition to the motion within seven (7) days after the filing of the motion to seal and designate all or part

of such memoranda as confidential. Any information designated as confidential in supporting or opposing memoranda will be treated as sealed pending a determination by the Court on the motion to seal. This serves as public notice that 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 and that if no objection is filed in a timely manner, the Court may treat the motion as uncontested. Objections to the motion should be filed in the Civil Section of the Clerk's Office. The Notice will be posted for a minimum of forty-eight (48) hours.

Respectfully Submitted,

/s/ Steven Tabackman
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*Attorneys for Federal Energy Regulatory
Commission*

CERTIFICATE OF SERVICE

I hereby certify that on September 13, 2021, I submitted the attached via the Court's ECF system, which shall serve an electronic copy on all counsel of record.

/s/ Steven Tabackman
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