

**IN THE UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF OHIO, WESTERN DIVISION**

NorCAL Tea Party Patriots, <i>et al.</i> ,)	
)	
Plaintiffs,)	Case No. 1:13-cv-341
)	
v.)	Judge Michael R. Barrett
)	
Internal Revenue Service, <i>et al.</i> ,)	
)	
Defendants.)	
)	

**JOINT NOTICE OF FILING OF
PREVIOUSLY SEALED DOCUMENTS**

Plaintiffs NorCAL Tea Party Patriots, *et al.*, together with third parties Lois Lerner and Holly Paz, by and through counsel (collectively, “the Parties”), jointly file this notice in response to the Court’s May 3, 2022 Opinion and Order (Doc. 455) (“Order”), directing the aforementioned parties to file redacted versions of certain previously sealed documents with the Court. The Parties further state:

1. The Court previously maintained several filings, exhibits, and other records under seal in this matter pending a decision on the Parties’ competing motions to seal and/or unseal those records.
2. On May 3, 2022, this Court issued its Order (Doc. 455) granting in part and denying in part the competing motions.
3. In relevant part, the Court’s Order directed the parties to file certain documents with redactions to what the Court viewed as sensitive information giving rise to the Parties’ dispute regarding whether the records should be sealed. The Court ordered that:

- a. Defendants¹ Lois Lerner and Holly Paz shall file copies of the briefing on their Motion for Protective Order with redactions to the sensitive and personal information included in those briefs, including references to their supporting declarations and exhibits documenting the harassment and death threats they and their families have faced within ninety (90) days of entry of this Order;
- b. Defendants Lois Lerner and Holly Paz shall file copies of the following documents with redactions to the names of their family members or personal friends, any home addresses or any other personal identifiers within ninety (90) days of entry of this Order: (1) Holly Paz Merits Deposition, Exhibit 43 in Support of United States' Motion for Summary Judgment (Doc. 355-17); (2) Lois Lerner Merits Deposition, Exhibit 44 in Support of United States' Motion for Summary Judgment (Doc. 355-18); and (3) United States' Statement of Proposed Undisputed Material Facts In Support of Its Motion for Summary Judgment on Class Action Claim (Doc. 357);
- c. Plaintiffs are permitted to file a redacted version of Plaintiffs' Memorandum in Opposition to Motion for Summary Judgment (Doc. 375); a redacted version of Plaintiffs' Statement of Material Facts and Response to IRS's Statement of Proposed Undisputed Facts (Doc. 375-1); and a redacted version of Holly Paz Class Certification Deposition, Exhibit 54 in Opposition to United States' Motion for Summary Judgment (Doc. 375-7²) which exclude references to the names of Lerner

¹ Lois Lerner and Holly Paz were dismissed as Defendants on July 17, 2014 (Doc. 102).

² The Parties note that the Holly Paz Class Certification Deposition was filed as Doc. 375-3, and not 375-7, as identified in the Order.

and Paz's family members or personal friends, any home addresses, or any other personal identifiers;

- d. Plaintiffs are permitted to file an unsealed version of Exhibit 104 to Plaintiffs' Opposition to United States' Motion for Summary Judgment (Doc. 375-5).

Doc. 455 at 14-15.

4. The Parties conferred and reached agreements on redactions for each of the documents subject to the Order. The following documents are filed concurrently with this Joint Notice with redactions consistent with the Order:

- a. Memorandum in Support of Former Individual Management Defendants' Motion for Protective Order (Doc. 331);
- b. Reply Brief in Support of Certain Former Individual Management Defendants' Motion for Protective Order (Doc. 344);
- c. Holly Paz Merits Deposition, Exhibit 43 in Support of United States' Motion for Summary Judgment (Doc. 355-17);
- d. Lois Lerner Merits Deposition, Exhibit 44 in Support of United States' Motion for Summary Judgment (Doc. 355-18);
- e. Plaintiffs' Statement of Material Facts and Response to IRS's Statement of Proposed Undisputed Facts (Doc. 375-1)³; and
- f. Holly Paz Class Certification Deposition, Exhibit 54 in Opposition to United States' Motion for Summary Judgment (Doc. 375-3).

³ To the extent there are underlying document exhibits either to this document or any others containing any redacted information, the Parties agree that those redactions apply equally to them.

5. The following documents are filed concurrently with this Joint Notice without any redactions consistent with the Order:

- a. United States' Statement of Proposed Undisputed Material Facts in Support of Its Motion for Summary Judgment on Class Action Claim (Doc. 357);
- b. Exhibit 104 to Plaintiffs' Opposition to United States' Motion for Summary Judgment (Doc. 375-5).

Respectfully submitted this 1st day of August, 2022.

Dated: August 1, 2022

Respectfully submitted,

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/s/ David Langdon

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***Counsel for Former Individual Management
Defendants Lois G. Lerner and Holly Paz***

Certificate of Service

The undersigned attorney hereby certifies that on August 1, 2022, the foregoing document was served via the Court's MC/ECF electronic notification system to all counsel of record.

/s/ Edward D. Greim

Attorney for Plaintiffs