

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
MIAMI DIVISION

Case Number: 1:24-cv-22142-GAYLES/GOODMAN

FANNY B. MILLSTEIN and  
MARTIN KLEINBART,

Plaintiffs,

v.

WELLS FARGO BANK, N.A.,

Defendant.

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**DEFENDANT WELLS FARGO BANK, N.A.'S UNOPPOSED MOTION TO  
PERMIT CONVENTIONAL FILING UNDER SEAL OF THUMB DRIVE**

Defendant Wells Fargo Bank N.A. (“Wells Fargo”), by and through its undersigned counsel, moves this Court for an Order permitting it to file the documents listed on its privilege log under seal via thumb drive. On January 31, 2025, a hearing was held in front of Chief Magistrate Judge Goodman. During the hearing, the Court instructed Wells Fargo to conventionally file a thumb drive containing those materials under seal by February 7, 2025, for in camera review. [ECF No. 68].<sup>1</sup>

WHEREFORE, Defendant Wells Fargo Bank, N.A. respectfully requests that this Court enter an Order permitting Wells Fargo to conventionally file under seal of thumb drive containing the documents listed on its privilege log for such other and further relief as this Court deem just and proper.

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<sup>1</sup> At Chief Magistrate Judge Goodman’s direction, a courtesy copy of the materials and a thumb drive will be delivered to the Chief Judge Goodman’s Chambers.

**CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1.A.3**

Pursuant to Local Rule 7.1.A.3, the undersigned counsel certifies that counsel for Defendant has conferred with counsel for Plaintiff, who consents to the relief requested in this Motion.

Dated: February 4, 2025

Respectfully submitted,

**MCGUIREWOODS LLP**

*/s/ Emily Y. Rottmann*

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on February 4, 2025, a copy of the foregoing was furnished by

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**[PROPOSED ORDER] GRANTING DEFENDANT  
WELLS FARGO BANK, N.A.'S UNOPPOSED MOTION TO  
PERMIT CONVENTIONAL FILING UNDER SEAL OF THUMB DRIVE**

THIS CAUSE is before the Court upon Defendant, Wells Fargo, N.A.'s ("Wells Fargo") Motion to Permit Filing of Thumb Drive ("Motion"). Upon review of the Motion, and being otherwise fully advised on the premises, the Court finds good cause to grant the request.

Accordingly, it is hereby **ORDERED** and **ADJUDGED** as follows:

1. Wells Fargo's Motion is **GRANTED**.
2. Wells Fargo shall deliver the thumb drive to the Clerk's Office, for conventional filing under seal.

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**JONATHAN GOODMAN**  
Chief United States Magistrate Judge

*CC: Counsel of Record*