

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
CASE NO. 21-61332-CIV-RUIZ**

CHANEL, INC.,

Plaintiff,

vs.

THE INDIVIDUALS, BUSINESS ENTITIES,  
AND UNINCORPORATED ASSOCIATIONS  
IDENTIFIED ON SCHEDULE “A,”

Defendants.

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**PLAINTIFF’S MOTION TO UNSEAL**

Plaintiff, Chanel, Inc. (“Plaintiff”), by and through its undersigned counsel, hereby moves this Court for an Order unsealing all documents that have been restricted/sealed from the Court docket and returning all portions of the Court file to the public records. As grounds therefore, Plaintiff states as follows:

1. On June 29, 2021, Plaintiff filed its Motion to File Under Seal [ECF No. 5], requesting Schedule “A” to Plaintiff’s Complaint be filed under seal. On June 30, 2021, the Court issued an Order granting Plaintiff’s Motion to File Under Seal [ECF No. 8, docketed July 2, 2021], and Plaintiff subsequently filed Schedule “A” to Plaintiff’s Complaint [ECF No. 9] under seal on July 6, 2021.

2. On June 29, 2021, Plaintiff filed its *Ex Parte* Application for Entry of Temporary Restraining Order, Preliminary Injunction, and Order Restraining Transfer of Assets, together with the supporting Declarations and Exhibits (the “*Ex Parte* Application”) [ECF No. 6], pursuant to Local Rule 5.4(d), which requires, unless the Court directs otherwise, *ex parte* filings be restricted from public view.

3. On July 2, 2021, this Court issued a Sealed Order Granting Plaintiff's *Ex Parte* Application (the "Sealed Temporary Restraining Order"). Upon receipt, Plaintiff served the Sealed Temporary Restraining Order on the requisite financial institutions to restrain Defendants' financial accounts at issue.

4. As Plaintiff confirmed the restraints of Defendants' accounts and Plaintiff's audit of those accounts, Plaintiff will be serving Defendants with the Sealed Temporary Restraining Order, together with all other documents filed in this case.

5. As a seal on this matter is no longer required, Plaintiff respectfully requests this matter be unsealed and the portions of the docket relating to Plaintiff's *Ex Parte* Application, together with all other documents that have been restricted from the Court docket,<sup>1</sup> be returned to the public portion of the Court file, in compliance with the Court's June 30, 2021 Order requiring the same [ECF No. 8].

WHEREFORE, Plaintiff respectfully requests this Court issue an Order unsealing all documents filed with the Court that have been restricted from the Court docket, and direct the Clerk to return those portions of the Court file to the public records.

DATED: July 26, 2021.

Respectfully submitted,

STEPHEN M. GAFFIGAN, P.A.

By: **Stephen M. Gaffigan**

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<sup>1</sup> In accordance with Local Rule 5.4(d), Docket Entries 7 and 10-13 are restricted from the Court's docket as they relate to and reference Plaintiff's *Ex Parte* Application.