

NO.: NNH-CV-14-6050848-S

ZHAOYIN WANG,	:	SUPERIOR COURT
Plaintiff,	:	
	:	
v.	:	J.D. OF NEW HAVEN
	:	AT NEW HAVEN
BETA PHARMA, INC., DON ZHANG AND	:	
ZHEJIANG BETA PHARMA CO., LTD.,	:	
Defendants.	:	NOVEMBER 18, 2016

MOTION TO SEAL

Pursuant to Practice Book §§ 7-4B and 11-20A and the Court’s Order of October 24, 2016 (the “Oct. 24 Order”) [D.E. #186.20], defendants Beta Pharma, Inc. and Don Zhang (“Defendants”) hereby move to seal certain documents (the “Documents”) that they are filing on this date as further evidence in support of their Motion to Disqualify Opposing Counsel (the “Motion to Disqualify”) [D.E. #183.00], along with references to those documents in Defendants’ statement (the “Submission Statement”) being filed today, which explains the confidential and privileged status of the Documents and their significance for the Motion to Disqualify. The Documents are attached as exhibits to the Zhang Affidavit, which is an exhibit to that Statement. Counsel for Defendants have contacted Plaintiff’s counsel and determined that Plaintiff does not object to this Motion. Defendants file herewith a Memorandum of Law in support of this Motion.

As set forth fully in that Memorandum, the Oct. 24 Order requires Defendants to submit certain documents (the “Documents”) as exhibits in support of their Motion to Disqualify, in accordance with the provisions of the Protective Order that the Court entered by reference in the Oct. 24 Order. Under the Protective Order, Defendants can submit the Documents to the Court only by employing the procedure set forth in

Telephone: (609) 895-3304
Facsimile: (609) 896-1469
Email: JKolpen@foxrothschild.com
Email: bkurtis@foxrothschild.com
Admitted pro hac vice

Glenn A. Duhl
Siegel, O'Connor, O'Donnell & Beck, P.C.
150 Trumbull Street
Hartford, CT 06103
Tel. (860) 280-1215
Fax (860) 527-5131
Email: gduhl@siegelconnor.com

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been served upon the following counsel of record by email this 18th day of November, 2016.

Jonathan Katz, Esq.
Jacobs & Dow, LLC
350 Orange Street
New Haven, CT 06511
jkatz@jacobsllaw.com

/s/
Michael G. Caldwell (juris no. 421880)