

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

UNITED STATES OF AMERICA ex rel.	)	
JOSHUA HARMAN,	)	
	)	Civil Action No. 2:12-CV-89
Plaintiff,	)	
	)	
v.	)	
	)	
TRINITY INDUSTRIES, INC, and	)	
TRINITY HIGHWAY PRODUCTS, LLC,	)	
	)	
Defendants.	)	

**MOTION TO UNSEAL OF THE CENTER FOR AUTO SAFETY AND THE SAFETY  
INSTITUTE**

For the reasons set forth in the accompanying Brief in Support of Motion to Unseal, the Center for Auto Safety and The Safety Institute move this court to unseal any pleadings or other court records filed in this case as to which there has been no findings that the need for secrecy outweighs the public’s presumptive right of access to court records. A proposed order is attached.

Respectfully submitted,

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Attorneys for Intervenors

### **CERTIFICATE OF SERVICE**

I certify that a true copy of the above and foregoing document was served on each attorney of record or party in accordance with the Federal Rules of Civil Procedure on the 15<sup>th</sup> day of August, 2014, as indicated below to:

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/s/ David T. Bright  
David T. Bright

**CERTIFICATE OF CONFERENCE**

I hereby certify that I, counsel for The Center for Auto Safety and The Safety Institute has complied with Local Rule CV-7(H) and conferred with counsel for Plaintiff and Defendants by telephone on August 14, 2014 concerning this Motion to Unseal. Counsel for Plaintiff, Teresa Monroe, indicated that Plaintiff is neither opposed to, or in agreement with, the merits of this motion. Counsel for the Trinity Defendants, Sarah Teachout, indicated that the Trinity Defendants object to the unsealing of any record relating to this case, and are therefore opposed to the Motion to Unseal. Accordingly, the parties are unable to reach an agreement on the merits of the Motion to Unseal and the Court's intervention is necessary.

/s/ Jerry M. White  
Jerry M. White

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**[PROPOSED] ORDER**

For the reasons stated in the motion, the Court GRANTS the Center for Auto Safety and The Safety Institute’s Motion to Unseal and ORDERS that all documents filed under seal in the above-captioned case be unsealed.