UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

AMERICAN ASSOCIATION OF UNIVERSITY PROFESSORS, ET AL., Plaintiffs, v. MARCO RUBIO, ET AL., Defendants.	Case No. 1:25-cv-10685 (WGY)

PLAINTIFFS' ASSENTED-TO MOTION TO SEAL

Pursuant to Local Rule 7.2, Plaintiffs respectfully move the Court for leave to file under seal portions of their Motion to Compel Answers to Plaintiffs' Interrogatories, the Production of Documents, and the Production of Information Improperly Withheld as Privileged ("Motion"). The Motion and accompanying exhibits contain excerpts from the provisionally-sealed administrative record, Dkt. 106, and from non-public materials provided to Plaintiffs by Defendants in discovery. Defendants have consented to this request.

Plaintiffs will publicly file the non-confidential portions of the Motion by 6:00 p.m. EST on Friday, June 20, 2025. To the extent that portions of the underlying materials are later unsealed or designated non-confidential, Plaintiffs will unseal the relevant portions of the Motion by 6:00 p.m. EST on the next business day. *See* Dkt. 105 at 2 (asserting that, upon entry of a protective order, Defendants will "reassess whether and what record content should be deemed confidential"); Dkt. 128 (requesting a protective order). The parties agree that sealed portions of the Motion will not be used or disseminated outside of this litigation, nor outside of their intended purpose.

June 18, 2025

Respectfully submitted,

/s/ Scott Wilkens

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CERTIFICATE OF SERVICE

I, the undersigned counsel, certify that on June 18, 2025, I electronically filed the foregoing motion in the United States District Court for the District of Massachusetts using the CM/ECF system. I certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

Dated: June 18, 2025

/s/ Scott Wilkens
Scott Wilkens