

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF CONNECTICUT

SIG SAUER, INC.

Plaintiff,

v.

JEFFREY S. BAGNELL, ESQ., LLC,
and JEFFREY S. BAGNELL.

Defendants.

Civil Action No.: 3:22-cv-00885-VAB

**PLAINTIFF’S EMERGENCY MOTION TO SEAL THE ACCOMPANYING
EMERGENCY MOTION TO REMOVE FROM PUBLIC ACCESS
TWO IMPROPERLY REDACTED DOCUMENTS FILED BY DEFENDANTS**

Pursuant to D. Conn. L. Civ. Rules 4(a) and 5, Plaintiff SIG Sauer, Inc. requests that the Court permit the accompanying Emergency Motion to be filed under seal.

Plaintiff SIG Sauer learned today that Defendants failed to properly redact two documents that Defendants filed via ECF – ECF No. 200-1 and ECF No. 202-1. As set forth in more detail in the accompanying Emergency Motion (under seal), Defendants failed to take the proper technical steps to carry out the redactions that they purported to make when filing those documents under seal such that a member of the public is able to download these “redacted” filings and remove the redactions.

Plaintiff’s accompanying “Emergency Motion to Remove From Public Access Two Improperly Redacted Documents Filed by Defendants,” describes the technical manner by which Defendants improper redactions to ECF No. 200-1 and ECF No. 202-1 apparently occurred and the steps that a person could take to remove those redactions and be able to view the content that the Court ordered should remain under seal. See ECF No. 207. Plaintiff requests that its

Emergency Motion be filed under seal to preserve confidentiality and minimize the further harm that would occur should redactions to documents that the Court ordered to remain under seal be able to be removed more widely. D. Conn. L. Civ. R. 5(e); *see also Lugosch v. Pyramid Co. of Onondaga*, 435 F.3d 110, 120 (2d Cir. 2006) (“[T]he presumption of access” to judicial documents may be overcome by “countervailing factors includ[ing]...the privacy interests of those resisting disclosure.” (quoting *United States v. Amodeo*, 71 F.3d 1044, 1048 (2d Cir. 1995))).

Dated: July 28, 2025

Respectfully submitted,

SIG Sauer, Inc.
By its attorneys,
/s/ James R. Smart

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CERTIFICATE OF SERVICE

I hereby certify that on date, a copy of the foregoing was filed electronically. Notice of this filing will be sent via e-mail to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

Dated: July 28, 2025

/s/ James Smart

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