

**IN THE UNITED STATES COURT OF FEDERAL CLAIMS
BID PROTEST**

SPACE EXPLORATION TECHNOLOGIES CORP.,)	
)	
Plaintiff,)	
)	
v.)	Case No. <u>19-742 C</u>
)	
THE UNITED STATES,)	
)	
Defendant.)	
)	

**PLAINTIFF'S MOTION FOR LEAVE TO FILE COMPLAINT UNDER SEAL AND
MOTION FOR PROTECTIVE ORDER**

Pursuant to Appendix C ¶ III of the Rules of the United States Court of Federal Claims ("RCFC"), Plaintiff Space Exploration Technologies Corp. ("SpaceX"), by its undersigned counsel, hereby respectfully moves this Court for leave to file its Complaint under seal. In support of this motion, SpaceX states that the Bid Protest Complaint and accompanying exhibits contain SpaceX confidential and proprietary information and source selection information not appropriate for release to the public.

In addition, pursuant to Appendix C ¶ VI of the RCFC, SpaceX, by its undersigned counsel, hereby respectfully moves this Court for the issuance of a Protective Order covering the proceedings in this bid protest matter (including, but not limited to, the documents filed under seal). The proceedings in this matter will involve SpaceX's proprietary proposal information and source selection information that must be protected to safeguard the competitive process. Maintaining the confidentiality of this information requires that the Court issue a protective order covering the proceedings.

WHEREFORE, SpaceX respectfully requests that the Court grant Plaintiff's Motion for Leave to File Complaint Under Seal and Motion for Protective Order. SpaceX has attached a Proposed Order Granting Plaintiff's Motions and a Proposed Protective Order (taken verbatim from RCFC Form 8). In the event that the Court should deny these Motions, SpaceX respectfully requests that the Court grant it leave to withdraw its filings should SpaceX so elect.

Dated: May 17, 2019

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Respectfully Submitted,

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*Attorney of Record for Space Exploration
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CERTIFICATE OF SERVICE

I hereby certify that on this 17th day of May 2019, I caused a true and correct copy of the foregoing Motion for Leave to File Under Seal and Motion for Protective Order to be served by electronic delivery on:

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/s/ Craig A. Holman