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**ATTORNEYS FOR JEFFREY BARON,
ALLEGED DEBTOR**

**COUNSEL FOR THE PETITIONING
CREDITORS**

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re:

JEFFREY BARON,

Debtor.

§
§ **CASE NO. 12-37921-7**
§
§ **INVOLUNTARY CHAPTER 7**
§ **PROCEEDING**

JOINT MOTION TO FILE SETTLEMENT AGREEMENT UNDER SEAL

TO THE HONORABLE STACEY G.C. JERNIGAN,
UNITED STATES BANKRUPTCY JUDGE:

Pronske & Patel, P.C., Shurig Jetel Beckett Tackett, Dean Ferguson, Gary G. Lyon, Robert Garrey, Powers Taylor, LLP, Jeffrey Hall, and David Pacione (together, the “Petitioning Creditors”) and Jeffrey Baron, the Alleged Debtor (“Baron” and together with the Petitioning Creditors, the “Parties”) file this Joint Motion to File Settlement Agreement Under Seal (the “Motion”) pursuant to Sections 105(a) of the United States Bankruptcy Code and 11 U.S.C. §§ 101 *et. seq.* (the “Bankruptcy Code”), for the entry of an order authorizing the Parties to file their proposed settlement agreement containing personal and confidential information under seal. In support of this Motion, the Parties respectfully represents as follows:

1. As more fully set forth in the motion to approve settlement agreement filed contemporaneously with this motion (the "Settlement Agreement"), the Petitioning Creditors, Baron, and potentially other parties have reached a settlement and agreed wind-down plan to finally resolve the disputes underlying the Receivership and involuntary matter that provides for the payment in full of the Receivership professional claims allowed by the District Court, payment of the claims of the Petitioning Creditors' and other attorney claimants at an agreed percentage, and return of Baron's remaining assets to Baron or the appropriate Receivership party.

2. The Parties believe that the Settlement Agreement contains confidential, sensitive information that should not be made publicly available until after the expedited hearing requested on Monday, June 24, 2013, including details related to the sale of a portfolio of domain names and the terms of a proposed compromise between Baron and his current lawyers. There is a risk that, should these sensitive details become publicly available, the terms of the Settlement Agreement may no longer be viable.

3. The Parties respectfully request this Court's permission to file the Settlement Agreement under seal prior to the requested expedited hearing on Monday, June 24, 2013.

WHEREFORE, PREMISES CONSIDERED, the Petitioning Creditors and Baron respectfully request that the Court enter an order authorizing the Parties to file the Settlement Agreement under seal and grant the Petitioning Creditors and Baron such other and further relief to which they may be justly entitled.

Dated: June 21, 2013.

Respectfully submitted,

/s/ Melanie P. Goolsby

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And

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*with permission */s/ Melanie P. Goolsby*

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ALLEGED DEBTOR**

CERTIFICATE OF SERVICE

The undersigned does hereby certify that, on June 21, 2013, a true and correct copy of the above and foregoing pleading was served upon the counsel and parties listed below via email and also via ECF email upon all parties accepting such service.

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