

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA**

Case No.: 1:25-cv-20757-JB/Torres

JANE DOE,
Plaintiff,

v.

STEVEN K. BONNELL II,
Defendant.

**DEFENDANT STEVEN K. BONNELL II'S MOTION FOR LEAVE TO FILE
DOCUMENTS UNDER SEAL**

Defendant Steven K. Bonnell II ("Bonnell"), pursuant to Southern District of Florida Local Rule 5.4 and Paragraph 12 of the Protective Order Governing Discovery [ECF No. 116], respectfully requests leave of Court to file documents under seal, and states as follows:

1. On June 1, 2026, Bonnell filed his Opposition to Plaintiff's Motion For Spoliation Sanctions [ECF No. 271], a Declaration of Steven K. Bonnell in support of his Opposition to Plaintiff's Motion For Spoliation Sanctions [ECF No. 272], and a Declaration of Andrew B. Brettler in support of his Opposition to Plaintiff's Motion For Spoliation Sanctions [ECF No. 273].

2. Bonnell's submissions and associated materials rely on the deposition testimony of both Plaintiff and non-party Lauren Hayden. Specifically, Exhibit B to the Declaration of Andrew B. Brettler [ECF No. 273-2] is comprised of excerpts from Plaintiff's deposition transcript dated April 27, 2026, and Exhibit C to the Declaration of Andrew B. Brettler [ECF No. 273-3] is comprised of excerpts from Ms. Hayden's deposition transcript dated December 12, 2025.

3. Plaintiff has designated both her and Ms. Hayden's entire deposition transcripts as "Confidential" pursuant to the Protective Order Governing Discovery [ECF No. 116]. Bonnell

disputes Plaintiff's blanket designation of her and Ms. Hayden's entire deposition transcripts as "Confidential."

4. The parties have been unable to resolve this dispute. Accordingly, Plaintiff—as the proponent of confidentiality of her and Ms. Hayden's entire deposition transcripts—must comply with Paragraph 17 of the Protective Order Governing Discovery and move the Court for a ruling as to whether her and Ms. Hayden's entire deposition transcripts may be properly treated as "Confidential."

5. As of the filing of Bonnell's Opposition to Plaintiff's Motion For Spoliation Sanctions and associated materials, Plaintiff has not yet moved the Court for such a ruling.

6. To comply with the current-but-disputed "Confidential" designation of Plaintiff's and Ms. Hayden's entire deposition transcripts, Exhibit B and Exhibit C to the Declaration of Andrew B. Brettler [ECF Nos. 273-2, 273-3] are proposed to be filed under seal.

7. The deposition testimony of both Plaintiff and Ms. Hayden is central to Bonnell's Opposition to Plaintiff's Motion For Spoliation Sanctions. Bonnell therefore respectfully requests leave of Court to file under seal unredacted versions of Exhibit B and Exhibit C to the Declaration of Andrew B. Brettler so that the Court can fully consider Bonnell's Opposition to Plaintiff's Motion For Spoliation Sanctions.

8. Bonnell proposes that the unredacted versions of Exhibit B and Exhibit C to the Declaration of Andrew B. Brettler remain under seal until the Court has ruled on Plaintiff's presumably forthcoming motion as to whether Plaintiff's and Ms. Hayden's entire deposition transcripts are properly treated as "Confidential."

9. If the Court finds that Plaintiff's and Ms. Hayden's entire deposition transcripts are not properly treated as "Confidential," then Bonnell respectfully requests that the Court authorize

Bonnell to file unredacted versions of Exhibit B and Exhibit C to the Declaration of Andrew B. Brettler.

WHEREFORE, Defendant Steven K. Bonnell II respectfully requests that the Court grant him leave to file under seal Exhibit B and Exhibit C to the Declaration of Andrew B. Brettler [ECF Nos. 273-2, 273-3], and award any further relief the Court deems just and proper.

LOCAL RULE 7.1(a)(2) CERTIFICATE OF CONFERRAL

WE HEREBY CERTIFY that on June 2, 2026, undersigned counsel for movant conferred with counsel for Plaintiff regarding the relief sought in this Motion, and Plaintiff's counsel indicated that they did not oppose Bonnell's requested relief for leave to file under seal Exhibit B and Exhibit C to the Declaration of Andrew B. Brettler.

Dated: June 3, 2026

Respectfully submitted,

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Counsel for Steven K. Bonnell II

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on June 3, 2026, a true and correct copy of the foregoing document was electronically filed with the Clerk of Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record, including those listed in the below Service List, via transmission of Notices of Electronic Filing generated by CM/ECF.

By: /s/ Michael S. Morgan
Michael S. Morgan

SERVICE LIST

Jane Doe v. Steven K. Bonnell II
Case No.: 1:25-cv-20757-JB

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