

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DIVISION OF TEXAS  
HOUSTON DIVISION**

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

U.S. ANESTHESIA PARTNERS, INC.,

Defendant.

**Case No. 4:23-CV-03560-KH**

**Plaintiff Federal Trade Commission's Unopposed Motion to File Temporarily Under Seal**

Pursuant to paragraph 9 of the Revised Protective Order entered in this Action (ECF Nos. 149-1, 152), Plaintiff Federal Trade Commission moves to file under temporary seal the unredacted versions of Plaintiff Federal Trade Commission's Motion to Compel Deposition of Dr. Paul Klotman (ECF No. 225) and the Declaration of Laura R. Hall in Support of Plaintiff Federal Trade Commission's Motion to Compel Deposition of Dr. Paul Klotman (ECF No. 225-2) because the documents contain information designated as Confidential Material and Highly Confidential Material. The Producing Entities of the Confidential Material and Highly Confidential Material, defendant U.S. Anesthesia Partners, Inc. and non-party Baylor College of Medicine will have fourteen days to provide a basis for maintaining the records under seal.

February 25, 2025

Respectfully submitted,

/s/ Laura R. Hall  
Laura R. Hall  
Federal Trade Commission  
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**CERTIFICATION OF CONFERRAL**

On February 24, 2025, I, Laura R. Hall, counsel for the FTC, spoke by telephone with Sara Brinkmann, counsel for Baylor College of Medicine, who confirmed that she did not object to the motion to file temporarily under seal. I also left a voicemail message for and emailed Rebecca Beynon, counsel for U.S. Anesthesia Partners regarding the motion to seal, and she responded by email to confirm that she did not object to the motion to file temporarily under seal.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on February 24, 2025, in Gardiner, New York.

/s/ Laura R. Hall  
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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on February 25, 2025, I electronically filed a true and correct copy of the foregoing document and the Proposed Order Granting Plaintiff Federal Trade Commission’s Motion to File Temporarily Under Seal using the United States District Court for the Southern District of Texas’s CM/ECF System.

I FURTHER CERTIFY that I served the foregoing document and the Proposed Order Granting Plaintiff Federal Trade Commission’s Motion to File Temporarily Under Seal on the following counsels via electronic mail:

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