

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF LOUISIANA**

IN RE:	§	
	§	
COPSYNC, INC.	§	CASE NO.: 17-12625
	§	
Debtor	§	CHAPTER 11
	§	
	§	

**DEBTOR'S AMENDED *EX PARTE* MOTION TO FILE
DOCUMENT UNDER SEAL**

NOW INTO COURT, through undersigned counsel, comes COPsync, Inc. ("Debtor"), a debtor-in-possession and files this Amended *Ex Parte* Motion to File Document Under Seal ("Amended Motion to Seal").

1.

The Debtor respectfully requests that this Court grant it leave to file under seal the full, unredacted copy of Exhibit B to the Cure Schedules (as defined below) and to Exhibit 1 to Schedule G, Executory Contracts and/or Unexpired Leases of the Amended Schedules. In compliance with page 7, paragraph 8 a. of this Court's Order (A) Authorizing and Approving Bid Procedures to be Employed in Connection with the Proposed Sale of the Debtor's Assets, (B) Scheduling an Auction and Sale Hearing, (C) Authorizing and Approving Assignment Procedures, (D) Approving the Manner and Form of Notice of the Auction and Assignment Procedures and (E) Granting Related Relief dated October 19, 2017, D.E. 66, the Debtor filed its redacted Notice of Filing Cure Schedules in Compliance with the Order (A) Authorizing and Approving Bid Procedures to be Employed in Connection with the Proposed Sale of the Debtor's Assets, (B) Scheduling an Auction and Sale Hearing, (C) Authorizing and Approving

Assignment Procedures, (D) Approving the Manner and Form of Notice of the Auction and Assignment Procedures and (E) Granting Related Relief on November 6, 2017, D.E. 90 (the “Cure Schedules”).

2.

The full, unredacted copy of Exhibit B to the Cure Schedules and Exhibit 1 of Schedule G Executory Contracts and Unexpired Leases contains the Debtor’s customer list, which is the Debtor’s highly sensitive, confidential and proprietary commercial information.

3.

On November 6, 2017, the Debtor served each individual contract party with their respective cure amounts, as required by the Sale Order, a Notice of Debtor’s Intent to Assume and Assign Certain Contracts and Leases, but the undersigned redacted the other customer names, addresses and cure amounts.

4.

Now the Debtor seeks to file the entirety of the list in unredacted form under seal with this Court to protect the Debtor’s confidential commercial information from the Cure Schedules. The Debtor submits the attached amended memorandum in support of this Amended Motion to File Documents Under Seal.

WHEREFORE, for the foregoing reasons and those expressed in the Amended Memorandum in Support of this Amended Motion to File Documents Under Seal, COPsync, Inc. prays that the Court grant it leave to file the full, unredacted copy of Exhibit B to its Cure Schedules and to Schedule G Executory Contracts and/or Unexpired

Leases of the Schedules under seal and enter an Order that the full, unredacted copy of Exhibit B to its Cure Schedules and to Schedule G Executory Contracts and/or Unexpired Leases of the Schedules be sealed.

Respectfully submitted,

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