# IN THE UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

In re

Alexander E. Jones,

Debtor,

Bankruptcy Case No. 22-33553 (CML)

Chapter 11

In re

Free Speech Systems LLC,

Debtor,

Bankruptcy Case No. 22-60043 (CML)

Chapter 11

### **MOTION TO SEAL**

Alexander E. Jones ("Jones") and Free Speech Systems, LLC ("FSS"), the debtors and debtors-in-possession in the above captioned chapter 11 cases (collectively, the "Debtors") hereby respectfully requests the Court seal Exhibit A to the proposed Agreed Order on Debtors' Motion for Approval of Compromise and Settlement Under Federal Rule of Bankruptcy Procedure 9019 ("Agreed Order") and submits this Motion to Seal pursuant to Sections 107(c) of title 11 of the United States Code (the "Bankruptcy Code"), Rule 9037 of the Federal Rules of Bankruptcy Procedures (the "Bankruptcy Rules"), and Rule 9037-1 of the Local Bankruptcy Rules for the Southern District of Texas (the "Local Rules").

Given the public nature of these proceedings and the fact that the settlement contemplates potential and future trials, the Debtors request the dollar amounts set forth in <u>Exhibit A</u> to the Agreed Order be filed under seal. <u>Exhibit A</u> shall be provided to the U.S. Trustee and parties to the protective order entered in these cases.

Dated: June 8, 2023

Houston

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## **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing Motion was served upon all parties receiving or entitled to notice through CM/ECF on this  $8^{th}$  day of June, 2023.

/s/ Vickie L. Driver
Vickie L. Driver