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Plaintiff, self-represented

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

MARK JOSEPH NEJMEH, Plaintiff, v. **THERIVA BIOLOGICS, INC., STEVEN A. SHALLCROSS, JEFFREY J. KRAWS, JEFFREY WOLF and JOHN MONAHAN,** Defendants.	**Case No. 3:26-cv-00705-ART-CSD** **PLAINTIFF'S MOTION TO SEAL ECF NOS. 4-3 AND 4-4 AND TO FILE REDACTED COPIES (FED. R. CIV. P. 5.2; LR IC 6-1; LR IA 10-5)**

Plaintiff Mark Joseph Nejmeh, self-represented, moves under Federal Rule of Civil Procedure 5.2(d) and (e), Local Rule IC 6-1 and Local Rule IA 10-5 for an order (1) sealing ECF Nos. 4-3 and 4-4, and (2) granting Plaintiff fourteen days to file redacted copies of both for the public record. Plaintiff brings this motion to comply with the Court's rules on personal identifiers, Fed. R. Civ. P. 5.2 and Local Rule IC 6-1, which he did not follow when he filed his original exhibits.

MEMORANDUM OF POINTS AND AUTHORITIES

I. THE PERSONAL IDENTIFIERS

1. ECF Nos. 4-3 and 4-4 contain exhibits to Plaintiff's original Verified Complaint, filed September 16, 2026. On a page-by-page review, Plaintiff found these personal identifiers:

Document	Pages	Identifier
ECF No. 4-3	23 through 28	Plaintiff's full brokerage account number; page 23 also shows his home address
ECF No. 4-3	9, 13 and 14	Home address of a nonparty stockholder witness
ECF No. 4-4	2 and 6	Home address of the same nonparty witness
ECF No. 4-3	187	Home address of a second nonparty stockholder witness

2. Local Rule IC 6-1(a) requires parties to refrain from including, or to partially redact, financial account numbers (only the last four digits may be used) and home addresses (only the city and state may be listed) in all documents filed with the Court, including exhibits. Under Local Rule IC 6-1(c), the responsibility for redaction rests with the parties.

II. THE COURT MAY SEAL AND ORDER REDACTED COPIES

The Court "may order that a filing be made under seal without redaction" and "may later unseal the filing or order the person who made the filing to file a redacted version for the public record." Fed. R. Civ. P. 5.2(d). For good cause, the Court may also "require redaction of additional information." Fed. R. Civ. P. 5.2(e)(1). Sealing ECF Nos. 4-3 and 4-4 and replacing them with redacted copies protects the account number and the home addresses while keeping the exhibits available in the public record in redacted form. The nonparty witnesses did not file these documents and did not consent to the public filing of their home addresses. No party is prejudiced: the redaction removes only personal identifiers and changes no content of the exhibits.

III. RELIEF REQUESTED

(a) Seal ECF Nos. 4-3 and 4-4; and

(b) grant Plaintiff fourteen days from the order to file copies of ECF Nos. 4-3 and 4-4 in which financial account numbers show only the last four digits and home addresses show only the city and state.

Dated: October 31, 2026

Respectfully submitted,

/s/ Mark Joseph Nejmeh

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