

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF KENTUCKY
LEXINGTON DIVISION
CASE NO. 19-51200
(Jointly Administered)

IN RE: CAMBRIAN HOLDING COMPANY, INC., et al.
DEBTORS

CHAPTER 11

MOTION FOR LEAVE TO FILE SEALED DOCUMENT and
TO RESTRICT PUBLIC ACCESS

*** **

Comes now Key-Way, LLC (“Key-Way”), a creditor and critical vendor in these proceedings, by and through counsel, and consistent with the instructions of the Court at the December 16, 2021 hearing on Key-Way’s Motion to Compel American Resources Corporation to pay post-petition trade payables [ECF Doc. 1889], and in accordance with Section XXII of the Court’s Administrative Procedures Manual, herewith moves this Court leave to file as a sealed document the Critical Vendor Agreement entered into between the debtors in possession and Key-Way, LLC and that access to such document be restricted.

The Critical Vendor Agreement contains a paragraph that requires Key Way to maintain the confidentiality of the subject agreement. At the hearing in this matter on the subject Motion, the Court directed counsel for Key-Way to file the Critical Vendor Agreement as a sealed document in the record.

Respectfully submitted,

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BY: /s/ R. Aaron Hostettler
R. AARON HOSTETTLER

NOTICE:

Notice is hereby given that pursuant to local rule 9013-1(c)(xii) the foregoing Motion may be ruled upon by the Court without a hearing.

/s/ R. Aaron Hostettler
OF COUNSEL FOR KEY-WAY, LLC

CERTIFICATE OF SERVICE:

The undersigned does hereby certify that a true copy of the foregoing Motion was served this the 17th day of December 2021 electronically in accordance with the method established under this Court's CM/ECF administrative procedures upon all parties in the electronic filing system in this case including the United States Trustee and debtors' counsel and counsel for the unsecured creditors committee.

/s/ R. Aaron Hostettler
OF COUNSEL FOR KEY-WAY, LLC