

UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND

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IN RE ROYAL AHOLD N.V.
SECURITIES & ERISA LITIGATION

Civil No.: 1:03-MD-01539
ALL SECURITIES ACTIONS

-----X
**INTERIM SEALING MOTION OF LEAD PLAINTIFFS, THE PUBLIC EMPLOYEES'
RETIREMENT ASSOCIATION OF COLORADO AND GENERIC TRADING OF
PHILADELPHIA, LLC, FOR AN ORDER PERMITTING FILING OF DISCOVERY
MATERIAL UNDER SEAL PURSUANT TO THE CONFIDENTIALITY ORDER**

NOW COME Lead Plaintiffs, the Public Employees' Retirement Association of Colorado ("COPERA") and Generic Trading of Philadelphia, LLC ("Generic Trading"), by and through their undersigned counsel, to move this Court as follows:

1. Pursuant to paragraph 3 of the Order Governing Confidential Treatment of Discovery Material entered in this action (Docket No. 82) (the "Confidentiality Order") and Local Rule 105.11, Lead Plaintiffs file this Interim Sealing Motion seeking an Order to permit Lead Plaintiffs to file under seal the following documents in connection with Lead Plaintiffs' Reply Memorandum of Law in Further Support of their Motion for Class Certification, Appointment of Class Representatives and Appointment of Class Counsel:

- a. The transcript of the deposition of Martin Paulsen, taken on October 18, 2005;
- b. The transcript of the deposition of James Liptak, taken on October 19, 2005;
- c. The transcript of the deposition of Daniel G. Viola, taken on October 21, 2005;
- d. The transcript of the deposition of Joachin Schallmayer, taken on October 28, 2005; and

e. The transcript of the deposition of Joachin von Cornberg, taken on October 31, 2005.

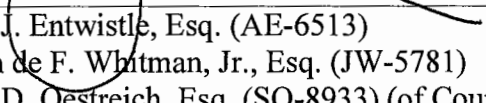
2. Lead Plaintiffs seek to file the above-referenced documents under seal because they contain information that constitutes Discovery Material, as defined in paragraph 1 of the Confidentiality Order. Lead Plaintiffs reserve all rights under the Confidentiality Order.

3. Pursuant to paragraph 3 of the Confidentiality Order, Lead Plaintiffs have filed paper copies of the documents referenced in paragraph 1 of this Motion with the Court in envelopes marked "SEALED PURSUANT TO ORDER OF COURT DATED DECEMBER 19, 2003". Lead Plaintiffs have served copies of the documents referenced in paragraph 1 of this Motion upon the parties in Portable Document Format ("PDF") on compact disc, such that the documents are available to the parties in the same manner as they would be on the Court's ECF system.

WHEREFORE, Lead Plaintiffs, COPERA and Generic Trading, respectfully request that this Honorable Court enter the Proposed Order submitted concurrently herewith.

Dated: November 9, 2005

Respectfully Submitted,



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**[PROPOSED] ORDER GRANTING LEAD PLAINTIFFS'
INTERIM SEALING MOTION**

Upon consideration of the Interim Sealing Motion (the "Motion") dated November 9, 2005, filed on behalf of Lead Plaintiffs, the Public Employees' Retirement Association of Colorado ("COPERA") and Generic Trading of Philadelphia, LLC ("Generic Trading") seeking permission to file under seal the documents identified in the Motion:

It is hereby **ORDERED** that:

1. Lead Plaintiffs' Interim Sealing Motion is **GRANTED**;
2. Parties objecting to the filing under seal of the documents identified in the Motion, including Lead Plaintiffs, shall file such objection no later than **November 29, 2005** after meeting and conferring as required pursuant to paragraph 5 of the Confidentiality Order:

3. Copies of this Order and the accompanying Memorandum shall be **SENT** to counsel of record.

Date

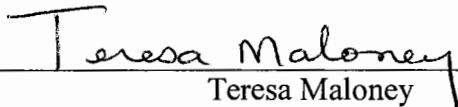
Hon. Catherine C. Blake
United States District Judge

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 9th day of November, 2005, I caused a true and correct Portable Document Format ("PDF") copy, contained on compact disc, of each of the following documents to be served on counsel on the attached list via U.S. mail:

1. The transcript of the deposition of Martin Paulsen, taken on October 18, 2005;
2. The transcript of the deposition of James Liptak, taken on October 19, 2005;
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Dated: November 9, 2005



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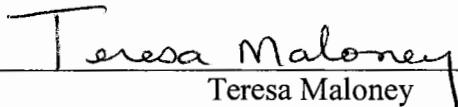
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