

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

|                                |   |                            |
|--------------------------------|---|----------------------------|
| JAMES L. ORRINGTON, II and     | ) |                            |
| JAMES L. ORRINGTON, II D.D.S., | ) |                            |
| P.C.,                          | ) |                            |
|                                | ) | Civil Action No. _____     |
| <b>Plaintiffs,</b>             | ) |                            |
| v.                             | ) |                            |
|                                | ) |                            |
| HUMANADENTAL INSURANCE         | ) | <b>JURY TRIAL DEMANDED</b> |
| COMPANY and HUMANA INC.,       | ) |                            |
|                                | ) |                            |
| <b>Defendants.</b>             | ) |                            |

**PLAINTIFFS JAMES L. ORRINGTON, II’S AND JAMES L. ORRINGTON,  
II D.D.S., P.C.’S MOTION FOR LEAVE TO FILE LIMITED  
PORTIONS OF THE AMENDED COMPLAINT UNDER SEAL**

Plaintiffs James L. Orrington, II and James L. Orrington, II D.D.S., P.C. (collectively, “Orrington”) file this Motion requesting leave to file under seal a limited amount of text in Orrington’s Amended Complaint filed in the above-captioned action.

1. This action has been brought in this Court based on diversity jurisdiction. Orrington asserts in this action claims, under Illinois state law, for defamation *per quod*, defamation *per se*, commercial disparagement, abuse of process, and intentional infliction of emotional distress. (Dkt. 1 at 7-13).

2. The primary factual basis for this action is a baseless complaint that Defendants filed with the Illinois Department of Professional and Financial Regulation concerning Orrington. The limited text in the Amended Complaint that Orrington wishes to file under seal concerns the nature of Defendants’ defamatory allegations.

3. Revealing the specific nature of Defendants' defamatory allegations will likely further spread those baseless allegations that Defendants have unjustifiably asserted against Orrington.

4. Attached as Exhibit A hereto is a proposed version of Orrington's Amended Complaint with the portions that Orrington seeks to have sealed redacted.

5. Orrington respectfully submits that good cause exists for maintaining this material under seal because further publishing Defendants' defamatory allegations would result in annoyance, embarrassment, oppression, and undue burden or expense to Orrington. *See* Fed.R.Civ.P. 26(c); *Mimms v. CVS Pharmacy, Inc.*, 1:15-cv-00970-TWP-MJD, 2016 WL 11547243, at \*2 (S.D. Ind. Jul. 14, 2016) (granting motion to seal appendix to summary judgment brief where said appendix contained a chart setting forth alleged defamatory statements made by the defendant about the plaintiff).

6. For the reasons set forth herein, Orrington requests that the Court grant Orrington leave to file limited portions of the Amended Complaint in this action under seal.

Date: February 4, 2022

Respectfully submitted,

/s/ Theodore J. Chiacchio

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