



and another offeror, Dynetics, Inc.—A Leidos Company (B-419783, B-419783.2) along with subsequently filed supplemental protests (B-419783.3 and B-4019783.4). During the proceedings before GAO, the GAO issued Protective Orders because the protests involved access to the Agency’s source selection sensitive information, as well as the proprietary and business confidential information of both Blue Origin and SpaceX, as well the other protester Dynetics.

Blue Origin anticipates that the current proceedings before the Court will require examination of the same information presented to GAO, and additional sensitive information in the Administrative Record. Paragraph 8 of the GAO Protective Order additionally provides that “[p]rotected material obtained under this protective order may be used . . . in a bid protest filed with the United States Court of Federal Claims, without GAO’s prior authorization, provided that the information is filed under seal with the Court, that the Court is informed of GAO’s protective order, and that the Court is requested to issue its own protective order to cover the protected material.” GAO Protective Order, EPDS Docket 3, at ¶ 8. The GAO’s order further states that “[u]se of material protected under the GAO protective order will be governed by the protective order issued by the Court.” *Id.*

Blue Origin will promptly request that the Court issue its own Protective Order to cover the protected material in this action.

Blue Origin’s Complaint contains protected material subject to GAO’s protective order and is appropriately filed under seal. Protected Material is indicated with gray highlighting. A proposed redacted version for public release of the Complaint is also supplied, in accordance with the Court’s rules.

WHEREFORE, Blue Origin respectfully requests that the Court grant its Motion for Leave to File a Complaint Under Seal.

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Respectfully submitted;



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