

IN THE UNITED STATES COURT OF FEDERAL CLAIMS
Bid Protest

SCALE AI, INC.,

Plaintiff,

v.

THE UNITED STATES,

Defendant.

PLAINTIFF'S MOTION FOR LEAVE TO FILE UNDER SEAL

Pursuant to Paragraph 4 of Appendix C of the Rules of the Court of Federal Claims, Plaintiff Scale AI, Inc. (“Scale”) respectfully requests leave of the Court to file Scale’s Complaint and accompanying exhibits under seal in the above-captioned action. Scale’s Complaint and exhibits contain information from Scale’s proposal that is proprietary and otherwise confidential business information. The public release of this information would cause competitive harm to Scale.

Contemporaneous with the filing of its Complaint and this motion, Scale is also filing a Motion for a Protective Order, requesting that the Court issue its standard protective order in this matter.

Accordingly, Scale respectfully requests the Court grant this request to file its Complaint and exhibits under seal.

January 27, 2026

Respectfully submitted,

/s/ Anuj Vohra
Anuj Vohra
(Counsel of Record)

Zachary H. Schroeder
Issac D. Schabes
(Of Counsel)

CROWELL & MORING LLP
1001 Pennsylvania Avenue, NW
Washington, DC 20004-2595
Tel: (202) 624-2502
Fax: (202) 628-5116
AVohra@crowell.com

Counsel for Scale AI, Inc.