

United States Courts
Southern District of Texas
FILED

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

MAR 10 2021

Nathan Ochsner, Clerk of Court

In re:)	
)	
MCDERMOTT INTERNATIONAL, INC, <i>et al</i>)	Chapter 11
)	
Reorganized Debtor(s).)	Case No. 20-30336
)	(Jointly Administered)
_____)	
MICHAEL VAN DEELEN)	
)	
Plaintiff,)	Adv. Proc. No. 20-3309
)	
v.)	
)	
DAVID DICKSON,)	
and STUART SPENCE,)	
and SCOTT LAMB,)	
and 10 JOHN/JANE DOES)	
)	
Defendants.)	

PLAINTIFF'S RESPONSE TO DEFENDANTS' EMERGENCY MOTION TO SEAL (DOCUMENT 36)

COMES NOW, the Plaintiff, Michael Van Deelen, and for his Plaintiff's Response to Defendants' Emergency Motion to Seal states as follows:

1. The Defendants' Emergency Motion to Seal ("Emergency Motion") is a frivolous motion that asks this Court to somehow seal documents none of which have been filed with it.

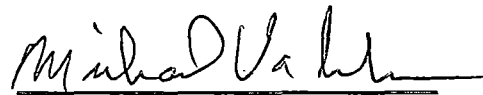
2. The Court can only seal documents that have been filed with it. 11 U.S.C. 107(a)(b).

3. None of the documents are related to the instant action.

4. One of the documents is an email (January 28, 2021) to attorneys who have worked on the above-captioned cases asking them to correct, clarify or retract defamatory statements they have made about Plaintiff. One of the documents (January 28, 2021) is a list of defamatory statements the defendants have they themselves made about Plaintiff in previous filings with this Court. One of the documents is a letter (Beck/Redden) from attorney David Beck the defendants retained to contact Plaintiff. The final document is an email (March 6, 2021) Plaintiff sent to Defendant attorney Matthew Cavanaugh asking him some questions about possible inappropriate behavior by his firm.

5. The defendants failed to appear at the March 10, 2021, hearing to discuss their motion. Plaintiff files the instant Response in an abundance of caution.

Dated March 10, 2021



Plaintiff
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CERTIFICATE OF SERVICE

I hereby certify that I have on this 10th day of March, 2021, served a true and correct copy of the foregoing document on the defendants via the court-approved eFiling system, which will forward a copy thereof to all attorneys of record.



Michael Van Deelen