

STATE OF NORTH CAROLINA
COUNTY OF WAKE

IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION
26CV035241-910

INTERLOCAL RISK FINANCING FUND
OF NORTH CAROLINA, BY AND
THROUGH ITS ADMINISTRATOR, THE
NORTH CAROLINA LEAGUE OF
MUNICIPALITIES,

Plaintiff,

v.

SEDGWICK CLAIMS MANAGEMENT
SERVICES, INC., AND THE TOWN OF
LAKE LURE

Defendants.

MOTION FOR LEAVE TO FILE
COMPLAINT AND CERTAIN
ACCOMPANYING EXHIBITS UNDER
SEAL

Plaintiff Interlocal Risk Financing Fund of North Carolina (“Plaintiff” or “IRFFNC”), by and through its Administrator, the North Carolina League of Municipalities (“Administrator” or “NCLM”), by and through the undersigned counsel, and pursuant to Rule 27 of the General Rules of Practice and Procedure for the Superior and District Courts, moves the Court for an Order permitting Plaintiff to file its Complaint and certain accompanying exhibits under seal. In support of this Motion Plaintiff shows as follows:

1. Contemporaneous with the filing of this Motion for Leave to File Complaint and Certain Accompanying Exhibits Under Seal (“Motion to Seal”), Plaintiff has provisionally filed its Complaint and certain accompanying exhibits under seal.
2. Plaintiff specifically seeks permission to file the Complaint and certain accompanying exhibits under seal and for the Complaint and certain exhibits to remain under seal pending a response from Defendant Sedgwick Claims Management Services, Inc. (“Sedgwick”)

as to its position on whether it believes the documents contain its confidential and/or proprietary business information and should remain under seal.

3. The following are nonconfidential descriptions of the Exhibits Plaintiff asks to remain under seal pending Sedgwick's response.

- a. Exhibit A is the contract between IRFFNC and Sedgwick for the performance of catastrophic adjusting services to be performed in North Carolina.
- b. Exhibit B is Sedgwick's first report dated October 23, 2024.
- c. Exhibit F is a November 6, 2024 email from the Executive General Adjuster at Sedgwick regarding the claims list.
- d. Exhibit G is Sedgwick's second report dated November 21, 2024.
- e. Exhibit H is a November 21, 2024 email from the Executive General Adjuster at Sedgwick regarding updated directives.
- f. Exhibit I is a December 31, 2024 email from the Executive General Adjuster at Sedgwick regarding Sedgwick's third report.
- g. Exhibit J is Sedgwick's third report dated December 31, 2024.
- h. Exhibit K is Sedgwick's fourth report dated January 27, 2025.
- i. Exhibit L is a February 4, 2025 email from NCLM claims personnel regarding looking at the dam.
- j. Exhibit M is a February 4, 2025 email from the Executive General Adjuster at Sedgwick regarding looking at the dam.

4. While the Complaint and Exhibits A-B and F-M do not contain and confidential or proprietary business information of the Plaintiff and Plaintiff does not believe they contain any information that justifies the documents remaining under seal indefinitely, Sedgwick may believe

the Complaint and some or all of Exhibits A-B and F-M contain its confidential and proprietary business information. Plaintiff has sought the consent of Sedgwick to disclose the types of information contained in Complaint and Exhibits A-B and F-M, and its response is pending.

5. Furthermore, no reasonable alternative to sealing the Complaint and some or all of Exhibits A-B and F-M exist, and the potential disclosure of such confidential and proprietary business information could be potentially harmful to Sedgwick.

6. Plaintiff requests that the Complaint and Exhibits A-B and F-M be accessible only to all counsel of record in this action.

7. The Complaint and some or all of Exhibits A-B and F-M should remain under seal until Sedgwick's responsive deadline to allow sufficient time to respond to Plaintiff's Motion to Seal at which time the parties can confer on the method for handling the documents upon unsealing.

WHEREFORE, Plaintiff respectfully request leave of the Court to file the Complaint and Exhibits A-B and F-M under seal and for the Complaint and Exhibits A-B and F-M to remain under seal pending a response from Defendant Sedgwick as to its position regarding whether the Complaint and/or any or all of Exhibits A-B and F-M should remain under seal.

This the 17th day of September, 2026.

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