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State of Minnesota
10/20/2026 3:35 PM

STATE OF MINNESOTA **DISTRICT COURT**

COUNTY OF OTTER TAIL **SEVENTH JUDICIAL DISTRICT**

Case Type: Breach of Contract/Tort
Court File No.: 56-CV-25-198
Judge Kevin M. Miller

Precision Locating, LLC and Arvig Enterprises, Inc.,

Plaintiffs,

v.

Martin D. Starkebaum,

Defendant.

NOTICE OF MOTION AND MOTION TO FILE EXHIBITS AS CONFIDENTIAL

NOTICE

PLEASE TAKE NOTICE THAT on a date and at a time selected by the Court, Plaintiffs Precision Locating, LLC ("Precision") and Arvig Enterprises, Inc. ("Arvig") (collectively, the "Plaintiffs") will bring the following Motion for Leave to File Documents as Confidential before this Court.[1]

MOTION

Plaintiffs Precision Locating, LLC ("Precision") and Arvig Enterprises, Inc. ("Arvig") move this Court for an order to permit them to file Exhibits A and B to this Notice of Motion dated October 20, 2026, confidentially, which includes the letter of Attorney Kurt J. Erickson (Exhibit A) and stamped pages of Summons and Complaint filed by Martin Starkebaum on October 7, 2026. (Exhibit B). This Motion is brought pursuant to Minn. R. Gen. Prac. 11.04(c) and the Parties' April 18, 2025, Protective Order, under which a litigant may submit a document for filing as

[1] Pursuant to Minn. Gen. R. Prac. 115.04, Plaintiffs ask the court to expedite consideration of the motion and consider the motion without a hearing.

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confidential or sealed if the filer files a motion for leave to file as confidential or under seal not later than at the time of submission of the document.

This Motion is based upon the Minnesota Rules of General Practice, the Court's April 18, 2025 protective order, and the supporting memoranda and exhibits to be filed and served in accordance with Rule 115.03 of the General Rules of Practice.

Dated: October 20, 2026

Respectfully submitted,

/s/ Kurt J. Erickson

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