

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

METLIFE, INC.,

Plaintiff,

v.

FINANCIAL STABILITY OVERSIGHT  
COUNCIL,

Defendant.

Civil Action No. 15-0045 (RMC)

**AMENDED CONTINGENT APPLICATION OF BETTER MARKETS, INC. FOR AN  
ORDER TO SHOW CAUSE WHY THE RECORD SHOULD NOT BE UNSEALED**

Here comes now Better Markets, Inc. (“Better Markets”), having moved under Rule 24(b) of the Federal Rules of Civil Procedure to intervene in this action for the limited purpose of unsealing the record. *See* ECF No. 89 (Nov. 19, 2015). If that motion is granted, Better Markets hereby applies to the Court for an Order to Show Cause why the record, briefing, and opinion in this action should not be unsealed. Previously, a memorandum of points and authorities in support of the application (the same memorandum supporting the motion to intervene) was submitted along with a proposed Order to Show Cause. *See id.* Attach. 2 & Ex. A. Better Markets’ contingent application and the proposed Order to Show Cause sought specifically the unsealing of the Joint Appendix and parties’ briefing.

In light of the Court’s order of March 30, 2016, which envisions redactions to a public version of the Court’s sealed opinion of the same date, *see* ECF No. 106, the original contingent application and proposed Order to Show Cause no longer reflect the full relief sought by Better

Markets. In short, Better Markets would have the proposed Order to Show Cause apply to the March 30 opinion in addition to the Joint Appendix and briefing. Accordingly, Better Markets hereby submits this amended contingent application, which seeks entry of the amended proposed Order to Show Cause, attached hereto.

Dated: March 31, 2016

Respectfully submitted,

/s/ Dennis M. Kelleher

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