

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

METLIFE, INC.,

Plaintiff,

v.

FINANCIAL STABILITY OVERSIGHT  
COUNCIL,

Defendant.

Civil Action No. 15-cv-45 (RMC)

**MOTION OF BETTER MARKETS, INC. TO INTERVENE  
FOR THE LIMITED PURPOSE OF UNSEALING THE RECORD**

Better Markets, Inc. (“Better Markets”), acting as a member of the public and as a public interest organization, hereby moves the Court, under Rule 24(b) of the Federal Rules of Civil Procedure, for an order permitting Better Markets to intervene for the limited purpose of seeking to unseal the record in this case. A proposed order and an accompanying memorandum of points and authorities in support of the motion are filed herewith.

Better Markets has conferred with opposing counsel about this motion and learned that the plaintiff, MetLife, Inc., opposes the motion to intervene, and that the defendant, the Financial Stability Oversight Council, takes no position at this time, but reserves the right to oppose after reviewing the motions. Should either party submit an opposition memorandum under LCvR 7(b), Better Markets will submit a reply memorandum under LCvR 7(d). Better Markets does not request oral argument on the motion to intervene, but is available should the Court decide to hold argument.

Dated: November 19, 2015

Respectfully submitted,

/s/ Dennis M. Kelleher

Dennis M. Kelleher

Better Markets, Inc.

D.C. Bar No. 1009682

Stephen W. Hall

D.C. Bar No. 366892

1825 K Street, N.W., Suite 1080

Washington, D.C. 20006

Tel: 202-618-6464

Email: [dkelleher@bettermarkets.com](mailto:dkelleher@bettermarkets.com)

Email: [shall@bettermarkets.com](mailto:shall@bettermarkets.com)