

1 [Firm Name]
[Firm Address]
2 [Firm Phone Number]
[Firm Fax]
3 [Firm Email]
[Attorney Name and Bar Number]
4 Attorney for Plaintiff(s)/Defendant(s)

5 [Trial Court System], [County]

6 **[Plaintiff Name(s)],**
7 Plaintiff(s),
8 v.
9 **[Defendant(s)],**
10 Defendant(s).

Case No.

MOTION TO FILE CATEGORY OF DOCUMENTS UNDER SEAL

[Optional: NOT OPPOSED]

Assigned to the Hon. [Judge]

14 Pursuant to [local civil rule], [Plaintiff(s)/Defendant(s)], by and through undersigned
15 counsel, hereby respectfully requests the Court enter an Order authorizing the following
16 [category/categories] of documents to be filed under seal:

17 [List and description of category or categories].
18
19

20 This Motion is made upon the grounds and for the reasons that:
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- 22 1. an overriding interest exists that supports filing all documents within the requested
23 [category/categories] under seal and overcomes the public's right of access to
24 documents of this specific type;
 - 25 2. there is a substantial probability of prejudice to [person likely to suffer prejudice] if
26 documents within the requested category are not filed under seal;
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- 3. the proposed restriction on public access is no greater than necessary to preserve the confidentiality of information contained in documents falling within the requested [category/categories] and subject to the overriding interest;
- 4. no reasonable, less restrictive alternative exists to preserve the confidentiality of the information.

[state whether motion is opposed or unopposed, and if opposed, identify the opposing party].

This Motion is supported by the attached Memorandum of Points and Authorities.

Dated this [Day] of [Month], [Year].

By _____
 [Name of Attorney]
 [Firm Name]
 [Firm Address]
 Attorney for Plaintiff(s)/Defendant(s)

On [Date], undersigned:
 [Filed/E-filed] the original;
 [Mailed/Emailed/Hand Delivered] a copy to:
 • [Opposing Counsel]
 [Address]

/s/[Attorney]