

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 DOCUMENTS
UNDER SEAL**

[Optional: NOT OPPOSED]

Assigned to the Hon. [Judge]

14 Pursuant to [local civil rule], [identification of moving party], by and through undersigned
15 counsel, hereby respectfully requests the Court enter an Order authorizing the
16 document(s) lodged herewith to be filed under seal. As required by [local civil rule], a
17 complete, unredacted copy of the document(s) for which permission to file under seal is
18 requested has been lodged with the court clerk [electronically/in paper form in a secured
19 envelope].

20 [OPTIONAL: In addition, pursuant to [local civil rule], a publicly accessible version of
21 the document(s) is attached hereto as Exhibit A, redacting only those portions of the
22 document(s) that are the subject of this Motion.]
23

24 This Motion is made upon the grounds and for the reasons that:

- 25
- 26 1. an overriding interest exists that supports filing the [lodged document(s)/portions
27 of the lodged document(s)] under seal and overcomes the public's right of access;
28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

- 2. there is a substantial probability of prejudice to [identification of whether prejudice is to person filing the motion, or another person] if the [lodged document(s)/portions of document(s)] are not filed under seal;
- 3. the proposed restriction on public access is no greater than necessary to preserve the confidentiality of information 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]