

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.

**NOTICE OF LODGING DOCUMENT  
SUBJECT TO [PROTECTIVE  
ORDER/CONFIDENTIALITY  
AGREEMENT]**

Assigned to the Hon. [Judge]

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14 **PLEASE TAKE NOTICE** that, pursuant to [local civil rule], [name of submitting party]  
15 seeks to publicly disclose the contents of the document(s) lodged herewith [in a court  
16 filing/deposition/other]. The document(s) was produced by [identification of party or  
17 person producing document] pursuant to a [protective order/confidentiality agreement]  
that requires the document to be filed under seal.

18 As required by [local civil rule], [name of submitting party] has conferred in good faith  
19 with [name of producing party or person] in an attempt to reach an agreement regarding  
20 whether the content of the document(s) satisfies [local civil rule]'s requirements for filing  
21 under seal. No agreement has been reached. A [local civil rule] good faith consultation  
certificate is attached. The nature of the dispute and [name of submitting party]'s position  
is summarized below.

22 [Summary of dispute and specification of submitting party's position].

23 Pursuant to [local civil rule], within [# of days in accordance with local rule] days after  
24 service of this Notice, [name of producing party or person] must file and serve a notice  
25 withdrawing its confidentiality designation and allowing the document(s) to be publicly  
26 filed, or a motion to seal and supporting memorandum under [local civil rule]. If no such  
27 notice or motion is filed, the Court may enter an order making the document part of the  
public record.

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

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By \_\_\_\_\_  
[Name of submitting party's 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]