

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)

[Trial Court System], [County]

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

Case No.

**STIPULATION AND REQUEST FOR
COURT ORDER AUTHORIZING
FILING OF CATEGORY OF
DOCUMENTS UNDER SEAL**

[Optional: NOT OPPOSED]

Assigned to the Hon. [Judge]

16 Pursuant to [local civil rule], the undersigned parties stipulate that the Court may enter an
17 Order authorizing the filing under seal of the following [category/categories] of
18 documents:

19 [List and description of category or categories].
20
21

22 This Stipulation and request for an Order authorizing filing under seal is made upon the
23 grounds and for the reasons that:

- 24
25 1. [OPTIONAL: [Explain why it is impracticable or would impose an undue burden
26 on court if sealing were addressed on a document-by-document basis and it makes
27 more sense to use a category].]
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2. an overriding interest exists that supports filing all documents within the requested category under seal and overcomes the public's right of access to documents of this specific type;
3. there is a substantial probability of prejudice to [identify party to suffer prejudice] if documents within the requested category are not filed under seal;
4. 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 and subject to the overriding interest;
5. no reasonable, less restrictive alternative exists to preserve the confidentiality of the information.

[Statement of whether stipulation is opposed or unopposed, and if opposed, identity of party opposing stipulation and statement that stipulation is accompanied by a good faith consultation certificate in accordance with local rule].

As required by [local civil rules], the facts and legal authority justifying this sealing request, and establishing why the request satisfies the requirements of [local civil rules], are as follows:

[Clear statement of facts and legal authority justifying sealing].

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

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

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

/s/[Attorney]
