

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.

**STIPULATION AND REQUEST FOR
COURT ORDER AUTHORIZING
FILING 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 document(s) lodged herewith to be filed under seal. As required by
18 [local civil rule], a complete, unredacted copy of the document(s) for which permission to
19 file under seal is requested has been lodged with the court clerk [electronically/in paper
20 form in a secured envelope].

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

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

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

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;

1 (3) the proposed restriction on public access is no greater than necessary to preserve the
2 confidentiality of information subject to the overriding interest;

3 (4) no reasonable, less restrictive alternative exists to preserve the confidentiality of the
4 information.

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

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

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

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

13
14
15 By _____
16 [Name of Attorney]
17 [Firm Name]
18 [Firm Address]
19 Attorney for Plaintiff(s)/Defendant(s)

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

26 _____
27 /s/[Attorney]