

DOCKET NO. WWM-CV-15-6009136 S

MELANIE PEREZ	:	SUPERIOR COURT
<i>Plaintiff</i>	:	
	:	JUDICIAL DISTRICT OF WINDHAM
v.	:	AT PUTNAM
	:	
STATE OF CONNECTICUT	:	
JUDICIAL DEPARTMENT	:	
<i>Defendant</i>	:	September 1, 2016

MOTION TO SEAL/REDACT DOCUMENTS

Pursuant to Conn. Practice Book §§ 7-4B, 11-20A and 11-20B, the defendant, the State of Connecticut Judicial Department ("Defendant" or "Judicial") moves to seal certain exhibits, specifically Exhibits 2, 4, (page 3) and 11 that are attached to the affidavit of Mark Ciarcicello.

In support of this motion, the defendant represents:

1. The plaintiff filed a complaint alleging that she was discriminated against by the Defendant.
2. The defendant is filing a motion for summary judgment this date and supporting Memorandum of Law in Support of the Motion for Summary Judgment regarding the Complaint filed by the plaintiff on February 3, 2015. (Docket Entry No. 100.31).
3. The exhibits mentioned above contain confidential medical information regarding the plaintiff, which should not be disseminated to the public.
4. In this motion, the defendant does not seek closure of the court room nor the sealing of the court's pleading file except for the specific exhibits cited.
5. The parties filed a Motion for Protective Order on November 19, 2015 (Docket Entry No. 118.00) which was granted by the Court on December 7, 2015 (Docket Entry No. 118.10, Calmer, J)

6. This motion is consistent with the Protective Order already in place.

WHEREFORE: In accordance with Conn. Practice Book §§ 7-4B, 11-20A, and 11-20B the defendant respectfully moves that this Court order a portion of the pleadings filed be sealed as set forth above.

DEFENDANT
STATE OF CONNECTICUT
JUDICIAL BRANCH

GEORGE JEPSEN
ATTORNEY GENERAL

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CERTIFICATION

The undersigned hereby certifies that on September 1, 2016 a true and accurate copy of the foregoing was sent by United States mail, first class postage prepaid, to the following:

Magdalena Wiktor, Esq.
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/s/ Josephine S. Graff _____
Josephine S. Graff
Assistant Attorney General