

DOCKET NO. FST-CV15-5014808-S)	SUPERIOR COURT
)	
WILLIAM A. LOMAS)	JUDICIAL DISTRICT OF
)	STAMFORD/NORWALK
Plaintiff,)	
)	
v.)	AT STAMFORD
)	
PARTNER WEALTH MANAGEMENT, LLC,)	
KEVIN G. BURNS, JAMES PRATT-HEANEY,)	
WILLIAM P. LOFTUS)	
)	OCTOBER 19, 2016
Defendants.)	

**CONDITIONAL MOTION TO FILE MATERIALS
DESIGNATED AS CONFIDENTIAL UNDER SEAL *NUNC PRO TUNC***

Pursuant to Practice Book §§ 7-4B, 7-4C and 11-20A, the Plaintiff William A. Lomas (“Lomas”) respectfully moves the Court to issue an order sealing his Reply Memorandum in Further Support of Plaintiff’s Motion for Appointment of Commission and for Leave to Take Deposition in New York of David Lagasse, Esq., dated October 13, 2016 [Dkt. No. 192.00] (“Reply”).¹ Lomas has lodged with the Court his unredacted Reply in accordance with Practice Book § 7-4C.

Specifically, page 12 of the Reply and Exhibits C, D and E contain information and include documents that the Defendants consider “Confidential” or privileged under the terms of the Stipulation and Protective Order entered in this case [Dkt. No. 152.00]. Thus, Lomas moves for a determination as to whether the Reply should be filed under seal.

¹ Concurrently with the filing of this Conditional Motion, Lomas has filed a Caseflow Request asking the Court to seal the Reply from the public view on the electronic docket for this case. Neither the Caseflow Request nor this Conditional Motion constitute an admission or acknowledgement that the Reply actually contains information or documents that should be considered confidential or privileged.

WHEREFORE, for the foregoing reasons, Lomas respectfully requests that the Court issue an order determining whether the Reply lodged with the Court should be filed under seal.

Dated: October 19, 2016
Hartford, Connecticut

THE PLAINTIFF,
WILLIAM A. LOMAS

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CERTIFICATE OF SERVICE

This is to certify that on October 19, 2016, a copy of the foregoing was served by e-mail and/or first class mail, postage prepaid, to all counsel of record as follows:

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