

NO. FBT-CV15-6054375-S

PAUL LIONETTI  
PLAINTIFF

v.

WESTERN CONNECTICUT  
STATE UNIVERSITY  
DEFENDANT

: SUPERIOR COURT  
:  
:  
: JUDICIAL DISTRICT OF  
: AT BRIDGEPORT  
:  
:  
:  
: November 1, 2016

**MOTION AND MEMORANDUM TO FILE SUMMARY JUDGMENT**  
**MOTION AND AFFIDAVIT AND EXHIBITS UNDER SEAL**

Pursuant to Connecticut Practice Book Section 11-20B, the defendant, Western Connecticut State University ("University") moves the Court to permit the filing under seal of the University's summary judgment motion and memorandum with attached affidavit and exhibits.

In support of this motion the University respectfully submits that the motion and memorandum, affidavit and other supporting materials may contain or directly describe personally identifiable student education records protected from public disclosure pursuant to the Family and Educational Rights and Privacy Act, 20 U.S.C. § 1232g et seq. and regulations promulgated thereunder ("FERPA"). Disclosure to the Court of such records is permitted, at least as to plaintiff. 34 C.F.R. § 99.31(a)(9)(iii)(B).

WESTERN CONNECTICUT  
STATE UNIVERSITY

GEORGE JEPSEN  
ATTORNEY GENERAL

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**CERTIFICATION**

I hereby certify that a copy of the foregoing was e-mailed, this 1st day of November 2016 to: Paul M. Cramer pmcramer@sbcglobal.net.

/s/Walter Menjivar  
Walter Menjivar  
Assistant Attorney General