

DOCKET NO. WWM-15-6009136S

MELANIE PEREZ : SUPERIOR COURT
VS. : JUDICIAL DISTRICT OF
WINDHAM AT PUTNAM
STATE OF CONNECTICUT,
JUDICIAL DEPARTMENT : NOVEMBER 4, 2016

MOTION TO SEAL/REDACT DOCUMENTS

Pursuant to Connecticut Practice Book §7-4B, the Plaintiff Melanie Perez hereby moves to seal certain exhibits, specifically Exhibits 12, 16, 17 and 18, that are attached to Plaintiff's Opposition to Defendant's Motion for Summary Judgment. Plaintiff also seeks to redact portions of testimony contained in deposition excerpts and other documents that are attached as Exhibits 4, 6, 7, 8, 14 and 15 to the Opposition.

In support of this motion, the Plaintiff states as follows:

1. The Defendant filed a Motion for Summary Judgment on September 1, 2016 (No. #132).
2. The exhibits mentioned above contain confidential medical information regarding Plaintiff and others, as well as personnel information which should not be disseminated to the public.
3. The Plaintiff, by way of this motion, does not seek the closure of the court room nor the sealing of the court's pleading file except for the specific exhibits cited.

Wherefore, for all of the foregoing reasons, plaintiff requests that this motion be granted.

PLAINTIFF,
MELANIE PEREZ

By: s/
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CERTIFICATION OF SERVICE

This is to certify that a copy of the foregoing was sent by first class mail on this 4th day of November, 2016 to the following counsel of record:

Josephine S. Graff, Esq.
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s/
Magdalena B. Wiktor