

DOCKET NO. FBT-CV-15-5030346-S : SUPERIOR COURT  
AMIEL DABUSH DOREL : J.D. OF FAIRFIELD  
v. : AT BRIDGEPORT  
LLOYDS LONDON : November 9, 2016

**REPLY MEMORANDUM IN SUPPORT OF MOTION TO SEAL**

Defendants, certain Underwriters at Lloyd’s, London (“Underwriters”), submit this memorandum in support of the motion of plaintiff, Amiel Dabush Dorel, to seal, Entry No. 112.00. Defendants join in plaintiff’s motion. The plaintiff’s motion seeks to seal a document that was apparently accidentally filed with plaintiff’s withdrawal of the action. The withdrawal of the action stemmed from a negotiated settlement of this lawsuit. A confidentiality agreement was included as a condition of the settlement. Plaintiff, who is largely acting pro se, undertook to file a withdrawal of the action by delivering a paper copy of the withdrawal with the clerk. Apparently accidentally, plaintiff filed with the withdrawal a copy of the document that sets forth the terms and conditions of the settlement including the confidentiality agreement. The clerk then filed the documents. The withdrawal and other documents plaintiff left with the clerk appear at Entry No. 111.00 in the Court file. Obviously, the withdrawal was intended to be filed but the other settlement document, entitled General Release, was not to be publicly filed.

Good cause exists for sealing the portion of the Entry No. 111.00 that was filed in error. Public policy encourages parties to reach out to one another and reach a mutual agreement on resolving litigated disputes. As was the case here, assurance that the parties will maintain the privacy and confidentiality of the terms resolving a private dispute fosters the public interest in encouraging settlement. Generally, there is no public interest served in the public disclosure of the details of agreements to resolve private disputes.

Plaintiff's motion is narrowly crafted, seeking to seal only the portion of the record that was not intended to be publicly filed, that is, pages 2, 3 and 4 of Entry No. 111.00. The subject matter that the parties seek to seal was never intended to be public. It was evidently filed by mistake by a pro se party. There is no public interest served by the public disclosure of the information that the parties request to be sealed. Sealing the record will preserve the strong interest of the Court in encouraging settlement of disputes.

### CONCLUSION

Defendants respectfully join in plaintiff's motion to seal the General Release mistakenly filed as pages 2, 3 and 4 of Entry No. 111.00 together with such other and further relief as to the Court seems just and proper.

Dated: Wilton, Connecticut

Defendants,  
Certain Underwriters at Lloyd's, London

By: /s/ William A. Meehan  
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### CERTIFICATION

This is to hereby certify that a copy of the foregoing was mailed on November 9, 2016 to counsel and all pro se parties of record as follows:

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