

DOCKET NO.: FBT-CV-15-5030346-S : SUPERIOR COURT
 AMIEL DABUSH DOREL : J.D. OF FAIRFIELD
 V. : AT BRIDGEPORT
 LLOYDS LONDON : OCTOBER 26, 2016

**MEMORANDUM OF LAW SUPPORTING MOTION TO SEAL PAPERS
 SUPPORTING WITHDRAWL OF ACTION**

Plaintiff, Amiel Dabush Dorel (hereinafter "Dorel") hereby submits this memorandum of law in support of their motion for an order pursuant to Practice Book §§ 7-4B and 11-20A, sealing only the papers or attachments filed with the Withdrawal of Action in the above-captioned matter, specifically, a confidential General Release that was executed by Dorel as part of the resolution of the above-captioned matter.

The above-referenced General Release was mistakenly and erroneously filed with the Withdrawal of Action by the Plaintiff. As Dorel is a pro se plaintiff, therefore he is not familiar with the rules of the Superior Court and was under the mistaken impression that the release had to be filed with the Withdrawal of Action. The Release was to remain confidential between the Parties.

ARGUMENT:

Practice Book § 11-20A(c) provides in relevant part:

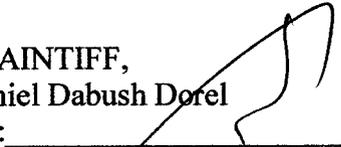
Upon written motion of any party, or upon its own motion, the judicial authority may order that files, affidavits, documents, or other materials on file or lodged with the court or in connection with a court proceeding be sealed or their disclosure limited only if the judicial authority concludes that such order is necessary to preserve an interest which is determined to

OFFICE OF THE CLERK
 SUPERIOR COURT
 2016 OCT 26 PM 1:21
 JUDICIAL DISTRICT OF
 FAIRFIELD AT BRIDGEPORT
 STATE OF CONNECTICUT

override the public's interest in viewing such materials. The judicial authority shall first consider reasonable alternatives to any such order and any such order shall be no broader than necessary to protect such overriding interest.

Clearly, the public has no overriding interest in knowing the terms under which two private parties resolved a civil dispute. Through the confidentiality provision in the release it is clear that neither party intended to have these terms become public. Only through inadvertent mistake of a pro se litigant did the General Release get filed with the Withdrawal of Action. Generally, it is the Court's position to encourage parties to resolve matters on their own and sealing the papers filed with the withdrawal would act in furtherance of that lofty goal. Furthermore, Dorel is only requesting that the Court order the General Release sealed. The actual Withdrawal of Action can and should remain part of the record. Finally, the Court should note that Defendant's counsel consents to the granting of this motion.

Accordingly, movant submits that an order should issue pursuant to Practice Book § 11-20A(c) providing that the General Release filed with the Withdrawal of Action be filed under seal in that the order is necessary to preserve an interest which overrides the public's interest in viewing such materials. Movant further submits that the proposed order is sufficiently limited, narrowly tailored and no broader than necessary to protect such overriding interest.

PLAINTIFF,
Amiel Dabush Dorel
By: 
Amiel Dabush Dorel
14 Marshall Lane
Weston, CT 06883
Ph: (203) 216-5128

CERTIFICATION

This is to hereby certify that a copy of the foregoing was mailed on October 26, 2016 to all counsel and pro se parties of record as follows:

William Andrew Meehan
396 Danbury Road
Wilton, CT 06897