

D. N. UWY-CV14-6025333-S : SUPERIOR COURT/CLD
ROBIN SHERWOOD, ET AL : J.D. OF WATERBURY
V. : AT WATERBURY
STAMFORD HOSPITAL : NOVEMBER 21, 2016

MEMORANDUM OF LAW IN SUPPORT OF MOTION TO SEAL

Pursuant to Practice Book §11-20A, the Plaintiffs **ROBIN SHERWOOD AND GREG HOESLSCHER** have moved to seal the attached documents filed in support of the Plaintiffs' oppositions to Defendants' motions for summary judgment. Motions to seal are governed by Practice Book §7-4B, §7-4C and §11-20A. Practice Book §7-4B(b) requires the filing of a memorandum of law to justify the sealing or limited disclosure.

In the opinion of the undersigned, these documents do not meet the stringent requirements under Connecticut law to require sealing. We filed the motion to seal because the Defendants insisted on a protective order which requires us to file such a motion in order to keep everything secret regarding what they do.

**ORAL ARGUMENT NOT REQUESTED
TESTIMONY NOT REQUIRED**

THE PLAINTIFFS,

BY: /s/ Jacqueline E. Fusco
Jacqueline E. Fusco, Esq.
Tooher Wool & Leydon LLC
80 Fourth Street
Stamford, CT 06905
(203) 324-6164
Juris No. 106151

CERTIFICATION

This is to certify that a copy of the foregoing was Emailed this date, to all counsel of record.

Eric J. Stockman, Esq.
estockman@npmlaw.com
Simon I. Allentuch, Esq.
sallentuch@npmlaw.com
Neubert Pepe & Monteith, PC
195 Church Street
13th Floor
New Haven, CT 06510
***Counsel for Defendant Stamford Health
System Inc. d/b/a Stamford Hospital***

/s/ Jacqueline E. Fusco
Jacqueline E. Fusco, Esq