

1. Local Rule 5.2.1 requires parties to obtain leave of Court in order to file documents under seal.

2. Jane has brought several claims against Third-Party Defendants under federal law. These claims involve sensitive, non-public details regarding Jane's medical history, gender identity, and the most intimate aspects of her life. Due to the sensitivity of the facts underlying these claims, this Court has previously granted motions to seal, and permitted Jane to proceed pseudonymously. Dkt. 28; Dkt. 29; Dkt. 83.

3. Jane intends to file a motion that will discuss confidential personal information that the Court has previously granted permission to seal, and exhibits that Jane intends to submit with the motion are confidential documents under federal law that should not be publicly disclosed.

4. In light of the sensitivity of information involved in this case and contained in the documents Jane intends to file, and in order to maintain the privacy of private and intimate details, Jane respectfully requests leave of this Court to seal her motion papers and supporting documents. Good cause exists to seal these papers because Jane's substantial privacy interests in the intimate details of her life, and the parties' interests in not publicizing confidential records, outweigh any public interest served by opening these papers to the public.

5. Due to Jane's young age, the highly sensitive and private nature of the facts involved, and the potential psychological harm she and her family would endure if these facts were made public, Jane has particularly strong privacy interests that must be protected by this Court. Moreover, the fact that Jane has proceeded pseudonymously to date does not on its own provide sufficient confidentiality, because members of her community and potentially other members of the public who are aware of the case can identify her despite use of the pseudonym.

6. Sealing the record will not prejudice any of the parties in this case, because they are already aware of Jane, Joyce, and John Doe's identities and will have access to the information contained in Jane's sealed filings.

7. Plaintiffs and Third-Party Defendants have consented to the relief sought in this motion.

For the foregoing reasons, Jane Doe respectfully urges this Court to GRANT this motion to seal her forthcoming motion.

Dated: March 06, 2018

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on March 06, 2018 all counsel of record who are deemed to have consented to electronic service are being served with a copy of the foregoing instrument via the Court's CM/ECF filing system.

s/ John Harrison

John Harrison

Dated: March__, 2018.

HONORABLE ALGENON L. MARBLEY
U.S. DISTRICT JUDGE