

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Newport News Division

GAVIN GRIMM,)	
)	
Plaintiff,)	
)	
v.)	Civil Case No. 4:15-cv-54-AWA-DEM
)	
GLOUCESTER COUNTY SCHOOL)	
BOARD,)	
)	
Defendant.)	
_____)	

**PLAINTIFF’S MOTION TO FILE EXHIBITS ATTACHED TO REPLY
MEMORANDUM IN FURTHER SUPPORT OF PLAINTIFF’S MOTION FOR
SUMMARY JUDGMENT UNDER SEAL**

Pursuant to Local Civil Rule 5, and the parties’ Agreed Confidentiality Protective Order, ECF No. 85, Plaintiff Gavin Grimm (“Gavin”) respectfully moves the Court for an order sealing Exhibits B, C, D, and E, which have been attached to Medley-Warsoff Declaration 4/16/19 of Plaintiff’s Reply Memorandum of Law in Further Support of his Motion for Summary Judgment. A copy of the Exhibits to be filed under seal have been sent to the Clerk’s Office in a sealed envelope marked as such. In support of this Motion, Plaintiff files a Memorandum in Support, a Notice of Sealing Motion, and a Proposed Order in accordance with Local Rule 5(C).

Respectfully submitted,

AMERICAN CIVIL LIBERTIES UNION
FOUNDATION OF VIRGINIA, INC.

/s/ Eden B. Heilman

Eden B. Heilman (VSB No. 93554)
Jennifer Safstrom (VSB No. 93746)
Nicole Tortoriello (VSB No. 91129)
ACLU of Virginia
701E. Franklin Street, Suite 1412
Richmond, VA 23219
(804) 644-8022 (Phone)
(804) 649-2733 (Fax)
eheilman@acluva.org
jsafstrom@acluva.org
ntortoriello@acluva.org

AMERICAN CIVIL LIBERTIES UNION
FOUNDATION

Joshua A. Block*
Leslie Cooper*
Shayna Medley-Warsoff*
125 Broad Street
18th Floor
New York, NY 10004
(212) 549-2627 (Phone)
(212) 549-2650 (Fax)
jblock@aclu.org
lcooper@aclu.org
smedley@aclu.org

* Admitted *pro hac vice*

Counsel for Plaintiff

Dated: April 16, 2019

CERTIFICATE OF SERVICE

I hereby certify that on this 16th day of April 2019, I filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will automatically serve electronic copies upon all counsel of record.

/s/ Eden Heilman
Eden B. Heilman (VSB No. 93554)
AMERICAN CIVIL LIBERTIES UNION
FOUNDATION OF VIRGINIA, INC.
701 E. Franklin Street, Suite 1412
Richmond, Virginia 23219
Phone: (804) 644-8080
Fax: (804) 649-2733
eheilman@acluva.org

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[Proposed] ORDER

The Court has reviewed Plaintiff’s Motion to Seal, and the public memorandum filed in support thereof. Upon consideration of Plaintiff’s motion and supporting memorandum, the Court hereby FINDS:

1. That public notice of the request to seal and a reasonable opportunity to challenge the request has been given;
2. That the targeted and limited sealing sought by Plaintiff is the least drastic alternative available; and
3. That the common law and First Amendment presumptions in favor of public access to records are outweighed for the reasons set forth in Plaintiff’s public memorandum.

Accordingly, for good cause shown, it is hereby

ORDERED that Plaintiff’s Motion to Seal is GRANTED; and

IT IS FURTHER ORDERED that the Clerk shall immediately and permanently seal Exhibits B, C, D, and E of Plaintiff’s Reply Memorandum in Further Support of Plaintiff’s Motion for Summary Judgment.

DATE: _____

U.S. District Judge