

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

JIONNI CONFORTI,

Plaintiff,

v.

ST. JOSEPH'S HEALTHCARE SYSTEM,
INC.; ST. JOSEPH'S HOSPITAL AND
MEDICAL CENTER D/B/A ST. JOSEPH'S
REGIONAL MEDICAL CENTER; and
FATHER MARTIN D. ROONEY,

Defendants.

Case No. 2:17-cv-00050-CCC-CLW

NOTICE OF MOTION TO SEAL

PLEASE TAKE NOTICE that, as soon as he may be heard, Plaintiff Jionni Conforti ("Mr. Conforti"), by and through his counsel Quinn Emanuel Urquhart & Sullivan, LLP ("Quinn Emanuel"), shall move before the Honorable Cathy L. Waldor, of the United States District Court for the District of New Jersey, Martin Luther King, Jr. U.S. Courthouse and Federal Building, 50 Walnut Street, Newark, NJ 07101, for an Order granting Mr. Conforti's motion permitting the parties to seal Exhibit 1, the proposed redacted transcript of June 20, 2019 hearing, (Dkt. 94), on Mr. Conforti's Motion to Quash and for a Protective Order, (Dkt. 70).

PLEASE TAKE FURTHER NOTICE that a proposed Order granting the relief requested is submitted herewith.

DATED: August 5, 2019

Respectfully submitted,

By: s/ Jaclyn M. Palmerson

Jaclyn M. Palmerson (N.J. Bar No. 209452016)

Jane M. Byrne (*pro hac vice*)

Todd Anten (*pro hac vice*)

Thomas L. Barnes (*pro hac vice*)

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Attorneys for Plaintiff Jionni Conforti

CERTIFICATE OF SERVICE

I, Thomas L. Barnes, hereby certify that, on August 5, 2019, I served true and correct copies of the Motion to Seal on the following counsel of record by email:

Christopher Sawyer Mayer, Esq.
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/s/ Thomas L. Barnes
Thomas L. Barnes

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MOTION TO SEAL

Pursuant to Local Civil Rule 5.3, Plaintiff Jionni Conforti ("Mr. Conforti"), by and through his counsel Quinn Emanuel Urquhart & Sullivan, LLP ("Quinn Emanuel"), respectfully moves this Court for an order permitting the parties to file under seal Exhibit 1, the redacted transcript of the June 20, 2019 hearing, (Dkt. 94), on Mr. Conforti's Motion to Quash and for a Protective Order, (Dkt. 70). The filing contains discussions of and explicit references to Mr. Conforti's highly sensitive personal history and medical information including medical records and deposition testimony currently designated as "Confidential" or "Attorneys' Eyes Only." Mr. Conforti relies upon the Discovery Confidentiality Order issued by this Court, (Dkt. 21), and his privacy rights and interests as grounds for sealing.

Undersigned counsel has conferred with counsel for Defendants St. Joseph's Healthcare System, Inc., St. Joseph's Hospital and Medical Center (d/b/a St. Joseph's Regional Medical Center), and Father Martin D. Rooney (collectively, "Defendants"), who, without waiver of their objections to Mr. Conforti's "Attorneys' Eyes Only" designations of certain medical records, (*see* Dkts. 69 and 70), consent to this motion. The parties have further conferred on the proposed

redactions to the June 20, 2019 hearing transcript from Mr. Conforti's Motion to Quash and for a Protective Order, submitted to the Court as Exhibit 1, and agreed to all of the proposed redactions.

WHEREFORE, Mr. Conforti respectfully requests that the Court grant this Motion and enter an order permitting the filing under seal of the redacted version of the transcript from the June 20, 2019 hearing, (Dkt. 94), on Mr. Conforti's Motion to Quash and for a Protective Order, (Dkt. 70).

DATED: August 5, 2019

Respectfully submitted,

By: *s/ Jaclyn M. Palmerson*

Jaclyn M. Palmerson (N.J. Bar No. 209452016)

Jane M. Byrne (*pro hac vice*)

Todd Anten (*pro hac vice*)

Thomas L. Barnes (*pro hac vice*)

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Attorneys for Plaintiff Jionni Conforti

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Defendants.

Case No. 2:17-cv-00050-CCC-CLW

**DECLARATION OF JACLYN M.
PALMERSON IN SUPPORT OF
MOTION TO SEAL**

I, **JACLYN M. PALMERSON**, of full age, hereby certify as follows:

1. I am an attorney at law of the State of New Jersey and a member in good standing of the bar of this Court. I am an associate of the firm of Quinn Emanuel Urquhart & Sullivan, LLP, counsel for Plaintiff Jionni Conforti ("Mr. Conforti") in the above-captioned matter.

2. I submit this Declaration on behalf of Mr. Conforti in support of Mr. Conforti's Motion to Seal the redacted version of the transcript from the June 20, 2019 hearing, (Dkt. 94), on Mr. Conforti's Motion to Quash and for a Protective Order, (Dkt. 70).

3. I have personal knowledge of the facts set forth herein or believe such facts to be true based upon information provided by knowledgeable persons.

4. In support of the Motion to Seal and in accordance with L. Civ. R. 5.3(c)(3), counsel for Mr. Conforti has prepared a redacted version of the June 20, 2019 hearing transcript (Ex. 1) and the attached index (Ex. 2) identifying the redacted information Mr. Conforti seeks to seal and describing with particularity: (a) the nature of the material; (b) the legitimate private or public interest which warrants the relief sought; (c) the clearly defined and serious injury that would result if the relief sought is not granted; (d) why a less restrictive alternative to the relief sought is not

available; (e) any prior order sealing the same materials in the pending action; and (f) the identity of any party or nonparty known to be objecting to the sealing request. A true and correct copy of the index is attached as Exhibit 2.

5. The redacted filing, as discussed in the index, contains, references, and/or reflects highly sensitive personal and medical information from Mr. Conforti's medical records and deposition testimony, which are currently designated as "Confidential" or "Attorneys' Eyes Only."

6. If an unredacted version of this filing were to become available to the public, Mr. Conforti would likely suffer significant harm. Public disclosure of the sealed material would disseminate highly confidential medical and personal information about Mr. Conforti and undermine Mr. Conforti's rights and interests in keeping such information private. Further, such publication would harm Mr. Conforti's trust and confidential relationships with his medical providers and jeopardize his ability to seek medical care without fear that the information he provides would become public.

7. No less restrictive alternative to sealing the redacted versions of the hearing transcript is available. Mr. Conforti's confidential information must be protected from disclosure in order to keep it confidential. Exhibit 1 to Mr. Conforti's Motion to Seal is comprised of explicit references to Mr. Conforti's highly sensitive medical records, currently designated by Mr. Conforti as "Attorneys' Eyes Only," that he sought to protect in his Motion to Quash and for a Protective Order (Dk. 70). Further, the proposed redactions to the June 20, 2019 hearing transcript (Ex. 1) are tailored and limited to the most sensitive information therein, and the unredacted portions sufficiently disclose the nature of the parties' discovery disputes to the public. The limited redactions serve to safeguard Mr. Conforti's rights and legitimate interests in keeping such information private.

8. On February 4, 2019, the Court granted a motion to seal a pre-motion joint letter filed by Mr. Conforti, which contained the same or similar highly sensitive and personal medical information at issue here. (Dkt. 68).

9. Counsel for Defendants has indicated that, without waiver to Defendants' rights with respect to future applications to seal and Defendants' objections to Mr. Conforti's "Attorneys' Eyes Only" designations of certain medical records pending before the Court, they do not object to the instant request and proposed redactions. I am not aware of any other party or nonparty opposing this motion.

10. Accordingly, Mr. Conforti respectfully requests that the Court grant his Motion to Seal.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 5th day of August, 2019, in New York, New York.

/s/ Jaclyn M. Palmerson
Jaclyn M. Palmerson

**UNITED STATES DISTRICT COURT
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JIONNI CONFORTI,

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ST. JOSEPH'S HEALTHCARE SYSTEM,
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Defendants.

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[PROPOSED] ORDER TO SEAL

This matter having been brought before the Court by Plaintiff Jionni Conforti ("Mr. Conforti"), by and through his counsel Quinn Emanuel Urquhart & Sullivan, LLP, on notice to and without objection from counsel to Defendants St. Joseph's Healthcare System, Inc., St. Joseph's Hospital and Medical Center (d/b/a St. Joseph's Regional Medical Center), and Father Martin D. Rooney, for an Order granting Mr. Conforti's Motion To Seal, which is submitted under N.J. Local Civ. R. 5.3; and the Court having considered the papers submitted by Mr. Conforti in connection with this motion; and having heard the arguments of counsel, if any; and for good cause shown;

The Court makes the following findings of fact and conclusions of law:

1. Motions to seal are governed by Local Civil Rule 5.3(c), which requires the moving party to describe: (a) the nature of the materials or proceedings at issue; (b) the legitimate private or public interest which warrants the relief sought; (c) the clearly defined and serious injury that would result if the relief sought is not granted; (d) why a less restrictive alternative to the relief sought is not available; (e) any prior

order sealing the same materials in the pending action; and (f) the identity of any party or nonparty known to be objecting to the sealing request.

2. On February 15, 2019, counsel for Mr. Conforti filed a Motion to Quash and for a Protective Order, (Dkt. 69), and filed under seal an exhibit containing Mr. Conforti's highly confidential medical records, (Dkt. 70). On March 4, 2019, Defendants filed an unredacted version of their opposition brief also containing Mr. Conforti's confidential medical information under seal, (Dkt. 63). On March 19, 2019, Mr. Conforti filed a reply, which completed briefing on the motion. (Dkt. 76). On June 20, 2019, parties convened for a hearing on Mr. Conforti's Motion to Quash and for a Protective Order. (Dkt. 94).
3. Public disclosure of the sealed information would cause serious injury to Mr. Conforti by revealing confidential and highly sensitive personal and medical information disclosed to Mr. Conforti's medical providers.
4. The Court finds there is no less restrictive means for shielding this information. The June 20, 2019 hearing transcript (Dkt. 94) is comprised of many references by Mr. Conforti's counsel and counsel for Defendants to Mr. Conforti's highly sensitive personal information and medical records. Further, the proposed redactions to the hearing transcript, submitted to the Court as Exhibit 1 to the Motion to Seal, are tailored and limited to the most sensitive information therein, and the unredacted portions provide sufficient information to the public regarding the nature of the parties' discovery disputes. The limited sealed material serve to safeguard Mr. Conforti's rights and legitimate interests in keeping such information private.

5. On February 4, 2019, the Court granted Mr. Conforti's first motion to seal the parties' joint letter to the Court related the instant discovery dispute. (Dkt. 68).
6. The Court is unaware of any party or nonparty objecting to the sealing request.
7. "The Third Circuit has recognized the important privacy interest in one's medical records." *Bertolotti v. AutoZone, Inc.*, 132 F. Supp. 3d 590, 609 (D.N.J. 2015) (citing *Everett v. Nort*, 547 F. App'x 117, 122 n.9 (3d Cir. 2013) (citing *Doe v. Delie*, 257 F.3d 309 (3d Cir. 2001))). The material at issue contains Mr. Conforti's "private health information, which is protected from disclosure under the Health Insurance Portability and Accountability Act ("HIPAA")." *Id.* "Furthermore, public disclosure of an individual's medical history and personal identifying numbers has been held to be a clearly defined and serious injury sufficient to support sealing of medical records." *Id.* (citing *Harris v. Nielsen*, No. 09-cv-2982, 2010 WL 2521434, at *4 (D.N.J. June 15, 2010)).
8. The Court concludes that Mr. Conforti has demonstrated that his application meets the requirements of Local Civil Rule 5.3.

IT IS on this _____ day of August, 2019,

ORDERED, that Plaintiff Jionni Conforti's Motion to File Under Seal is granted.

At Newark, New Jersey

Hon. Cathy L. Waldor, U.S.M.J.

EXHIBIT 1

**PROPOSED TRANSCRIPT REDACTIONS
SUBMITTED TO COURT UNDER SEAL**

EXHIBIT 2

INDEX IN SUPPORT OF MOTION TO FILE UNDER SEAL

Material	Legitimate Public or Private Interest Warranting Relief	Clearly Defined and Serious Injury that Would Result if the Relief is Not Granted	Why a Less Restrictive Alternative to the Relief Sought is Not Available	Any Prior Order Sealing the Same Materials in the Pending Action	Party in Opposition to Sealing, if any, and Basis
Hearing Transcript p. 20, lines 7-10	<p>Mr. Conforti requests sealing page 20, lines 7-10 of the transcript from the hearing on his Motion to Quash and for a Protective Order, (Dkt. 70), because it contains references to Mr. Conforti's highly sensitive medical and mental health history.</p> <p>This information includes dates and diagnoses pertaining to Mr. Conforti's medical care. <i>See</i> Declaration of Jaclyn M. Palmerson ("Palmerson Decl.") ¶ 5.</p>	<p>If filed unredacted on the public docket, page 20, lines 7-10 will reveal highly confidential medical and personal information about Mr. Conforti and undermine Mr. Conforti's rights and interests in keeping such information private. Further, such publication would harm Mr. Conforti's trust and confidential relationships with his medical providers and jeopardize his ability to seek medical care without fear that the information he provides would become public.</p> <p>Further, these medical records are presently confidential and unavailable to the public. If this request to seal is not</p>	<p>Mr. Conforti maintains that any alternative to sealing medical records does not provide the protections required for such sensitive and/or restricted information. <i>See</i> Palmerson Decl. ¶ 7.</p>	<p>On February 4, 2019, the Court granted a motion to seal a pre-motion joint letter filed by Mr. Conforti, which contained the same or similar highly sensitive and personal medical information from Mr. Conforti's medical records. (Dkt. 68) (hereinafter, the "February 4 Sealing Order").</p>	None

Material	Legitimate Public or Private Interest Warranting Relief	Clearly Defined and Serious Injury that Would Result if the Relief is Not Granted	Why a Less Restrictive Alternative to the Relief Sought is Not Available	Any Prior Order Sealing the Same Materials in the Pending Action	Party in Opposition to Sealing, if any, and Basis
		<p>granted, the disclosure of this information would cause significant harm to Mr. Conforti, his rights, and his privacy interests. <i>See</i> Palmerson Decl. ¶ 6.</p>			
<p>Hearing Transcript p. 20, lines 12-17.</p>	<p>Mr. Conforti requests sealing page 20, lines 12-17 of the transcript of the hearing on his Motion to Quash and for a Protective Order, (Dkt. 70), because it is comprised entirely of Mr. Conforti’s highly sensitive medical and mental health history.</p> <p>This information includes diagnoses pertaining to Mr. Conforti’s medical care. <i>See</i> Declaration of Jaclyn M. Palmerson (“Palmerson Decl.”) ¶ 5.</p>	<p>If filed unredacted on the public docket, lines 12-17 on page 20 will reveal highly confidential medical and personal information about Mr. Conforti and undermine Mr. Conforti’s rights and interests in keeping such information private. Further, such publication would harm Mr. Conforti’s trust and confidential relationships with his medical providers and jeopardize his ability to seek medical care without fear that the information he provides would become public.</p>	<p>Mr. Conforti maintains that any alternative to sealing the redacted information does not provide the protections required for such sensitive and/or restricted information. <i>See</i> Palmerson Decl. ¶ 7.</p>	<p><i>See</i> the February 4 Sealing Order. (Dkt. 68).</p>	<p>None</p>

Material	Legitimate Public or Private Interest Warranting Relief	Clearly Defined and Serious Injury that Would Result if the Relief is Not Granted	Why a Less Restrictive Alternative to the Relief Sought is Not Available	Any Prior Order Sealing the Same Materials in the Pending Action	Party in Opposition to Sealing, if any, and Basis
		<p>Further, tis medical information is presently confidential and unavailable to the public. If this request to seal is not granted, the disclosure of this information would cause significant harm to Mr. Conforti, his rights, and his privacy interests. <i>See</i> Palmerson Decl. ¶ 6.</p>			
<p>Hearing Transcript p. 23, lines 6-15</p>	<p>Mr. Conforti requests sealing page 23, lines 6-15 of the hearing transcript from his Motion to Quash and for a Protective Order, (Dkt. 70), because it is comprised of Mr. Conforti’s highly sensitive medical and mental health history. This information includes conditions and diagnoses pertaining to Mr. Conforti’s medical care. <i>See</i> Declaration of Jaclyn M. Palmerson (“Palmerson Decl.”) ¶ 5.</p>	<p>If filed unredacted on the public docket, lines 6-15 of page 23 will reveal highly confidential medical and personal information about Mr. Conforti and undermine Mr. Conforti’s rights and interests in keeping such information private. Further, such publication would harm Mr. Conforti’s trust and confidential relationships with his medical providers and jeopardize his ability to seek medical care without</p>	<p>Mr. Conforti maintains that any alternative to sealing the redacted information does not provide the protections required for such sensitive and/or restricted information. <i>See</i> Palmerson Decl. ¶ 7.</p>	<p><i>See</i> the February 4 Sealing Order. (Dkt. 68).</p>	<p>None</p>

Material	Legitimate Public or Private Interest Warranting Relief	Clearly Defined and Serious Injury that Would Result if the Relief is Not Granted	Why a Less Restrictive Alternative to the Relief Sought is Not Available	Any Prior Order Sealing the Same Materials in the Pending Action	Party in Opposition to Sealing, if any, and Basis
		<p>fear that the information he provides would become public.</p> <p>Further, these medical records are presently confidential and unavailable to the public. If this request to seal is not granted, the disclosure of this information would cause significant harm to Mr. Conforti, his rights, and his privacy interests. <i>See</i> Palmerson Decl. ¶ 6.</p>			
Hearing Transcript, p. 23, lines 21-25.	Mr. Conforti requests sealing page 23, lines 21-25 of the hearing transcript from his Motion to Quash and for a Protective Order, (Dkt. 70), because it is comprised entirely of Mr. Conforti's highly sensitive family, medical and mental health history.	If filed unredacted on the public docket, page 23, lines 21-25 will reveal highly confidential medical and personal information about Mr. Conforti and undermine Mr. Conforti's rights and interests in keeping such information private. Further, such publication would harm Mr. Conforti's trust and	Mr. Conforti maintains that any alternative to sealing the redacted information does not provide the protections required for such sensitive and/or restricted information.	<i>See</i> the February 4 Sealing Order. (Dkt. 68).	None

Material	Legitimate Public or Private Interest Warranting Relief	Clearly Defined and Serious Injury that Would Result if the Relief is Not Granted	Why a Less Restrictive Alternative to the Relief Sought is Not Available	Any Prior Order Sealing the Same Materials in the Pending Action	Party in Opposition to Sealing, if any, and Basis
	<p>This information includes references pertaining to Mr. Conforti’s mental health. <i>See</i> Declaration of Jaclyn M. Palmerson (“Palmerson Decl.”) ¶ 5.</p>	<p>confidential relationships with his medical providers and jeopardize his ability to seek medical care without fear that the information he provides would become public.</p> <p>Further, these medical records are presently confidential and unavailable to the public. If this request to seal is not granted, the disclosure of this information would cause significant harm to Mr. Conforti, his rights, and his privacy interests. <i>See</i> Palmerson Decl. ¶ 6.</p>	<p><i>See</i> Palmerson Decl. ¶ 7.</p>		
<p>Hearing Transcript, p. 24, lines 6-21</p>	<p>Mr. Conforti requests sealing page 24, lines 6-21 of the hearing transcript from his Motion to Quash and for a Protective Order, (Dkt. 70), because it is comprised entirely of Mr. Conforti’s</p>	<p>If filed unredacted on the public docket, Defendants’ opposition will reveal highly confidential medical and personal information about Mr. Conforti and undermine Mr. Conforti’s rights and interests in</p>	<p>Mr. Conforti maintains that any alternative to sealing the redacted information does not provide the protections</p>	<p><i>See</i> the February 4 Sealing Order. (Dkt. 68).</p>	<p>None.</p>

Material	Legitimate Public or Private Interest Warranting Relief	Clearly Defined and Serious Injury that Would Result if the Relief is Not Granted	Why a Less Restrictive Alternative to the Relief Sought is Not Available	Any Prior Order Sealing the Same Materials in the Pending Action	Party in Opposition to Sealing, if any, and Basis
	<p>highly sensitive medical and mental health history.</p> <p>This information includes dates and diagnoses pertaining to Mr. Conforti's medical care. <i>See</i> Declaration of Jaclyn M. Palmerson ("Palmerson Decl.") ¶ 5.</p>	<p>keeping such information private. Further, such publication would harm Mr. Conforti's trust and confidential relationships with his medical providers and jeopardize his ability to seek medical care without fear that the information he provides would become public.</p> <p>Further, these medical records are presently confidential and unavailable to the public. If this request to seal is not granted, the disclosure of this information would cause significant harm to Mr. Conforti, his rights, and his privacy interests. <i>See</i> Palmerson Decl. ¶ 6.</p>	<p>required for such sensitive and/or restricted information. <i>See</i> Palmerson Decl. ¶ 7.</p>		
Hearing Transcript, p. 25, lines 17-22	Mr. Conforti requests sealing page 25, lines 17-22 of the hearing transcript from his Motion to Quash and for a	If filed unredacted on the public docket, lines 17-22 on p. 25 will reveal highly confidential medical and	Mr. Conforti maintains that any alternative to sealing the	<i>See</i> the February 4 Sealing Order. (Dkt. 68).	None

Material	Legitimate Public or Private Interest Warranting Relief	Clearly Defined and Serious Injury that Would Result if the Relief is Not Granted	Why a Less Restrictive Alternative to the Relief Sought is Not Available	Any Prior Order Sealing the Same Materials in the Pending Action	Party in Opposition to Sealing, if any, and Basis
	<p>Protective Order, (Dkt. 70), because it is comprised entirely of Mr. Conforti’s highly sensitive medical and mental health history.</p> <p>This information includes dates and diagnoses pertaining to Mr. Conforti’s medical care. <i>See</i> Declaration of Jaclyn M. Palmerson (“Palmerson Decl.”) ¶ 5.</p>	<p>personal information about Mr. Conforti and undermine Mr. Conforti’s rights and interests in keeping such information private. Further, such publication would harm Mr. Conforti’s trust and confidential relationships with his medical providers and jeopardize his ability to seek medical care without fear that the information he provides would become public.</p> <p>Further, these medical records are presently confidential and unavailable to the public. If this request to seal is not granted, the disclosure of this information would cause significant harm to Mr. Conforti, his rights, and his privacy interests. <i>See</i> Palmerson Decl. ¶ 6.</p>	<p>redacted information does not provide the protections required for such sensitive and/or restricted information. <i>See</i> Palmerson Decl. ¶ 7.</p>		

Material	Legitimate Public or Private Interest Warranting Relief	Clearly Defined and Serious Injury that Would Result if the Relief is Not Granted	Why a Less Restrictive Alternative to the Relief Sought is Not Available	Any Prior Order Sealing the Same Materials in the Pending Action	Party in Opposition to Sealing, if any, and Basis
<p>Hearing Transcript, p. 26, lines 12-13</p>	<p>Mr. Conforti requests sealing page 25, lines 17-22 of the hearing transcript from his Motion to Quash and for a Protective Order, (Dkt. 70), because it is comprised entirely of Mr. Conforti’s highly sensitive medical and mental health history.</p> <p>This information includes dates and diagnoses pertaining to Mr. Conforti’s medical care. <i>See</i> Declaration of Jaclyn M. Palmerson (“Palmerson Decl.”) ¶ 5.</p>	<p>If filed unredacted on the public docket, Defendants’ opposition will reveal highly confidential medical and personal information about Mr. Conforti and undermine Mr. Conforti’s rights and interests in keeping such information private. Further, such publication would harm Mr. Conforti’s trust and confidential relationships with his medical providers and jeopardize his ability to seek medical care without fear that the information he provides would become public.</p> <p>Further, these medical records are presently confidential and unavailable to the public. If this request to seal is not granted, the disclosure of this information would</p>	<p>Mr. Conforti maintains that any alternative to sealing the redacted information does not provide the protections required for such sensitive and/or restricted information. <i>See</i> Palmerson Decl. ¶ 7.</p>	<p><i>See</i> the February 4 Sealing Order. (Dkt. 68).</p>	<p>None.</p>

Material	Legitimate Public or Private Interest Warranting Relief	Clearly Defined and Serious Injury that Would Result if the Relief is Not Granted	Why a Less Restrictive Alternative to the Relief Sought is Not Available	Any Prior Order Sealing the Same Materials in the Pending Action	Party in Opposition to Sealing, if any, and Basis
		cause significant harm to Mr. Conforti, his rights, and his privacy interests. <i>See</i> Palmerson Decl. ¶ 6.			
Hearing Transcript p. 27, lines 10-11	<p>Mr. Conforti requests sealing page 27, lines 10-11 of the hearing transcript from his Motion to Quash and for a Protective Order, (Dkt. 70), because it contains sensitive medical and mental health history.</p> <p>This information includes references pertaining to Mr. Conforti's medical care. <i>See</i> Declaration of Jaclyn M. Palmerson ("Palmerson Decl.") ¶ 5.</p>	<p>If filed unredacted on the public docket, Defendants' opposition will reveal highly confidential medical and personal information about Mr. Conforti and undermine Mr. Conforti's rights and interests in keeping such information private. Further, such publication would harm Mr. Conforti's trust and confidential relationships with his medical providers and jeopardize his ability to seek medical care without fear that the information he provides would become public.</p> <p>Further, these medical records are presently confidential and</p>	Mr. Conforti maintains that any alternative to sealing the redacted information does not provide the protections required for such sensitive and/or restricted information. <i>See</i> Palmerson Decl. ¶ 7.	<i>See</i> the February 4 Sealing Order. (Dkt. 68).	None

Material	Legitimate Public or Private Interest Warranting Relief	Clearly Defined and Serious Injury that Would Result if the Relief is Not Granted	Why a Less Restrictive Alternative to the Relief Sought is Not Available	Any Prior Order Sealing the Same Materials in the Pending Action	Party in Opposition to Sealing, if any, and Basis
		unavailable to the public. If this request to seal is not granted, the disclosure of this information would cause significant harm to Mr. Conforti, his rights, and his privacy interests. <i>See</i> Palmerson Decl. ¶ 6.			
Hearing Transcript p. 29, lines 5-9	<p>Mr. Conforti requests sealing page 29, lines 5-9 of the hearing transcript from his Motion to Quash and for a Protective Order, (Dkt. 70), because it is comprised entirely of Mr. Conforti's highly sensitive medical and mental health history.</p> <p>This information includes dates and diagnoses pertaining to Mr. Conforti's medical care. <i>See</i> Declaration of Jaclyn M. Palmerson ("Palmerson Decl.") ¶ 5.</p>	<p>If filed unredacted on the public docket, lines 5-9 on p. 29 will reveal highly confidential medical and personal information about Mr. Conforti and undermine Mr. Conforti's rights and interests in keeping such information private.</p> <p>Lastly, these records are presently confidential and unavailable to the public. If this request to seal is not granted, the disclosure of this information would cause significant harm to Mr. Conforti, his rights, and</p>	Mr. Conforti maintains that any alternative to sealing the redacted information does not provide the protections required for such sensitive and/or restricted information. <i>See</i> Palmerson Decl. ¶ 7.	<i>See</i> the February 4 Sealing Order. (Dkt. 68).	None.

Material	Legitimate Public or Private Interest Warranting Relief	Clearly Defined and Serious Injury that Would Result if the Relief is Not Granted	Why a Less Restrictive Alternative to the Relief Sought is Not Available	Any Prior Order Sealing the Same Materials in the Pending Action	Party in Opposition to Sealing, if any, and Basis
		his privacy interests. <i>See</i> Palmerson Decl. ¶ 6.			
Hearing Transcript, p. 29, lines 18-19	<p>Mr. Conforti requests sealing of the redacted information on page 29, lines 18-19 of the hearing transcript from his Motion to Quash and for a Protective Order, (Dkt. 70), because it contains highly sensitive medical and mental health history.</p> <p>This information includes dates and diagnoses pertaining to Mr. Conforti's medical care. <i>See</i> Declaration of Jaclyn M. Palmerson ("Palmerson Decl.") ¶ 5.</p>	<p>If filed unredacted on the public docket, this section of the transcript will reveal highly confidential medical and personal information about Mr. Conforti and undermine Mr. Conforti's rights and interests in keeping such information private.</p> <p>Further, these medical records are not connected to Mr. Conforti publicly. If this request to seal is not granted, the disclosure of this information would cause significant harm to Mr. Conforti, his rights, and his privacy interests. <i>See</i> Palmerson Decl. ¶ 6.</p>	<p>Mr. Conforti maintains that any alternative to sealing the redacted information does not provide the protections required for such sensitive and/or restricted information. <i>See</i> Palmerson Decl. ¶ 7.</p>	<p><i>See</i> the February 4 Sealing Order. (Dkt. 68).</p>	None
Hearing Transcript p. 29, lines 21-22	<p>Mr. Conforti requests sealing of the redacted information on page 29, lines 21-22 of the hearing transcript from his</p>	<p>If filed unredacted on the public docket, p. 29, lines 21-22 of the transcript will reveal confidential medical</p>	<p>Mr. Conforti maintains that any alternative to sealing the</p>	<p><i>See</i> the February 4 Sealing Order. (Dkt. 68).</p>	None.

Material	Legitimate Public or Private Interest Warranting Relief	Clearly Defined and Serious Injury that Would Result if the Relief is Not Granted	Why a Less Restrictive Alternative to the Relief Sought is Not Available	Any Prior Order Sealing the Same Materials in the Pending Action	Party in Opposition to Sealing, if any, and Basis
	<p>Motion to Quash and for a Protective Order, (Dkt. 70), because it is of Mr. Conforti’s highly sensitive medical and mental health history.</p> <p>This information includes confidential discussions between Mr. Conforti and his medical providers, including references to highly sensitive personal and family medical history, medical diagnoses.</p>	<p>information about Mr. Conforti and undermine Mr. Conforti’s rights and interests in keeping such information private. Further, such publication would harm Mr. Conforti’s trust and confidential relationships with his medical providers and jeopardize his ability to seek medical care without fear that the information he provides would become public.</p> <p>Further, this medical information is presently confidential and unavailable to the public. If this request to seal is not granted, the disclosure of this information would cause significant harm to Mr. Conforti, his rights, and his privacy interests. <i>See</i> Palmerson Decl. ¶ 6.</p>	<p>redacted information does not provide the protections required for such sensitive and/or restricted information. <i>See</i> Palmerson Decl. ¶ 7.</p>		

Material	Legitimate Public or Private Interest Warranting Relief	Clearly Defined and Serious Injury that Would Result if the Relief is Not Granted	Why a Less Restrictive Alternative to the Relief Sought is Not Available	Any Prior Order Sealing the Same Materials in the Pending Action	Party in Opposition to Sealing, if any, and Basis
Hearing Transcript p. 30, lines 24-25	<p>Mr. Conforti requests sealing of the redacted information on page 30, lines 24-25 of the hearing transcript from his Motion to Quash and for a Protective Order, (Dkt. 70), because it is references highly sensitive medical and mental health history.</p> <p>This information includes diagnoses pertaining to Mr. Conforti's medical care. <i>See</i> Declaration of Jaclyn M. Palmerson ("Palmerson Decl.") ¶ 5.</p>	<p>If filed unredacted on the public docket, lines 24-25 of p. 30 of the transcript will reveal highly confidential medical information about Mr. Conforti and undermine Mr. Conforti's rights and interests in keeping such information private. Further, such publication would harm Mr. Conforti's trust and confidential relationships with his medical providers and jeopardize his ability to seek medical care without fear that the information he provides would become public.</p> <p>Further, these medical records are presently confidential and unavailable to the public. If this request to seal is not granted, the disclosure of</p>	<p>Mr. Conforti maintains that any alternative to sealing the redacted information does not provide the protections required for such sensitive and/or restricted information. <i>See</i> Palmerson Decl. ¶ 7.</p>	<p><i>See</i> the February 4 Sealing Order. (Dkt. 68).</p>	<p>None.</p>

Material	Legitimate Public or Private Interest Warranting Relief	Clearly Defined and Serious Injury that Would Result if the Relief is Not Granted	Why a Less Restrictive Alternative to the Relief Sought is Not Available	Any Prior Order Sealing the Same Materials in the Pending Action	Party in Opposition to Sealing, if any, and Basis
		this information would cause significant harm to Mr. Conforti, his rights, and his privacy interests. <i>See</i> Palmerson Decl. ¶ 6.			
Hearing Transcript p. 31 lines 3-5	<p>Mr. Conforti requests sealing of the redacted information on page 31, lines 3-5 of the hearing transcript from his Motion to Quash and for a Protective Order, (Dkt. 70), because it discusses Mr. Conforti's highly sensitive medical and mental health history.</p> <p>This information includes dates and diagnoses pertaining to Mr. Conforti's medical care. <i>See</i> Declaration of Jaclyn M. Palmerson ("Palmerson Decl.") ¶ 5.</p>	<p>If filed unredacted on the public docket, lines 3-5 on page 31 will reveal highly confidential medical and personal information about Mr. Conforti and undermine Mr. Conforti's rights and interests in keeping such information private. Further, such publication would harm Mr. Conforti's trust and confidential relationships with his medical providers and jeopardize his ability to seek medical care without fear that the information he provides would become public.</p> <p>Further, these medical records are presently</p>	Mr. Conforti maintains that any alternative to sealing the redacted information does not provide the protections required for such sensitive and/or restricted information. <i>See</i> Palmerson Decl. ¶ 7.	<i>See</i> the February 4 Sealing Order. (Dkt. 68).	None.

Material	Legitimate Public or Private Interest Warranting Relief	Clearly Defined and Serious Injury that Would Result if the Relief is Not Granted	Why a Less Restrictive Alternative to the Relief Sought is Not Available	Any Prior Order Sealing the Same Materials in the Pending Action	Party in Opposition to Sealing, if any, and Basis
		confidential and unavailable to the public. If this request to seal is not granted, the disclosure of this information would cause significant harm to Mr. Conforti, his rights, and his privacy interests. <i>See</i> Palmerson Decl. ¶ 6.			
Hearing Transcript p. 33, lines 2	Mr. Conforti requests sealing of the redacted information on page 33, lines 2 of the hearing transcript from his Motion to Quash and for a Protective Order, (Dkt. 70), because it is comprised entirely of Mr. Conforti's highly sensitive medical and mental health history. This information includes dates and diagnoses pertaining to Mr. Conforti's medical care. <i>See</i> Declaration of Jaclyn M. Palmerson ("Palmerson Decl.") ¶ 5.	If filed unredacted on the public docket, this section of the transcript will reveal highly confidential medical and personal information about Mr. Conforti and undermine Mr. Conforti's rights and interests in keeping such information private. Further, such publication would harm Mr. Conforti's trust and confidential relationships with his medical providers and jeopardize his ability to seek medical care without fear that the information he	Mr. Conforti maintains that any alternative to sealing the redacted information does not provide the protections required for such sensitive and/or restricted information. <i>See</i> Palmerson Decl. ¶ 7.	<i>See</i> the February 4 Sealing Order. (Dkt. 68).	None.

Material	Legitimate Public or Private Interest Warranting Relief	Clearly Defined and Serious Injury that Would Result if the Relief is Not Granted	Why a Less Restrictive Alternative to the Relief Sought is Not Available	Any Prior Order Sealing the Same Materials in the Pending Action	Party in Opposition to Sealing, if any, and Basis
		<p>provides would become public.</p> <p>Further, these medical records are presently confidential and unavailable to the public. If this request to seal is not granted, the disclosure of this information would cause significant harm to Mr. Conforti, his rights, and his privacy interests. <i>See</i> Palmerson Decl. ¶ 6.</p>			
Hearing Transcript p. 33, lines 8-9	Mr. Conforti requests sealing of the redacted information on page 33, lines 8-9 of the hearing transcript from his Motion to Quash and for a Protective Order, (Dkt. 70), because it is comprised entirely of Mr. Conforti's highly sensitive medical and mental health history.	If filed unredacted on the public docket, lines 8-9 on page 33 of the transcript will reveal highly confidential medical and personal information about Mr. Conforti and undermine Mr. Conforti's rights and interests in keeping such information private. Further, such publication would harm Mr. Conforti's trust and	Mr. Conforti maintains that any alternative to sealing the redacted information does not provide the protections required for such sensitive and/or restricted information.	<i>See</i> the February 4 Sealing Order. (Dkt. 68).	None.

Material	Legitimate Public or Private Interest Warranting Relief	Clearly Defined and Serious Injury that Would Result if the Relief is Not Granted	Why a Less Restrictive Alternative to the Relief Sought is Not Available	Any Prior Order Sealing the Same Materials in the Pending Action	Party in Opposition to Sealing, if any, and Basis
		<p>confidential relationships with his medical providers and jeopardize his ability to seek medical care without fear that the information he provides would become public.</p> <p>Further, these medical records are presently confidential and unavailable to the public. If this request to seal is not granted, the disclosure of this information would cause significant harm to Mr. Conforti, his rights, and his privacy interests. <i>See</i> Palmerson Decl. ¶ 6.</p>	<i>See</i> Palmerson Decl. ¶ 7.		
Hearing Transcript p. 38, lines 23-25	Mr. Conforti requests sealing of the redacted information on page 38, lines 23-25 of the hearing transcript from his Motion to Quash and for a Protective Order, (Dkt. 70), because it is comprised entirely of Mr. Conforti's	If filed unredacted on the public docket, lines 23-25 of page 38 will reveal highly confidential medical and personal information about Mr. Conforti and undermine Mr. Conforti's rights and interests in	Mr. Conforti maintains that any alternative to sealing the redacted information does not provide the protections	<i>See</i> the February 4 Sealing Order. (Dkt. 68).	None.

Material	Legitimate Public or Private Interest Warranting Relief	Clearly Defined and Serious Injury that Would Result if the Relief is Not Granted	Why a Less Restrictive Alternative to the Relief Sought is Not Available	Any Prior Order Sealing the Same Materials in the Pending Action	Party in Opposition to Sealing, if any, and Basis
	<p>highly sensitive mental health history.</p> <p>This information includes diagnoses pertaining to Mr. Conforti's medical care. <i>See</i> Declaration of Jaclyn M. Palmerson ("Palmerson Decl.") ¶ 5.</p>	<p>keeping such information private. Further, such publication would harm Mr. Conforti's trust and confidential relationships with his medical providers and jeopardize his ability to seek medical care without fear that the information he provides would become public.</p> <p>Further, these medical records are presently confidential and unavailable to the public. If this request to seal is not granted, the disclosure of this information would cause significant harm to Mr. Conforti, his rights, and his privacy interests. <i>See</i> Palmerson Decl. ¶ 6.</p>	<p>required for such sensitive and/or restricted information. <i>See</i> Palmerson Decl. ¶ 7.</p>		
Hearing Transcript p. 39, lines 11-13	Mr. Conforti requests sealing of the redacted information on page 39, lines 11-13 of the hearing transcript from his	If filed unredacted on the public docket, lines 11-13 of page 29 of the transcript will reveal highly	Mr. Conforti maintains that any alternative to sealing the	<i>See</i> the February 4 Sealing Order. (Dkt. 68).	None.

Material	Legitimate Public or Private Interest Warranting Relief	Clearly Defined and Serious Injury that Would Result if the Relief is Not Granted	Why a Less Restrictive Alternative to the Relief Sought is Not Available	Any Prior Order Sealing the Same Materials in the Pending Action	Party in Opposition to Sealing, if any, and Basis
	<p>Motion to Quash and for a Protective Order, (Dkt. 70), because it is comprised entirely of Mr. Conforti's highly sensitive medical and mental health history.</p> <p>This information includes dates and diagnoses and medicines prescribed pertaining to Mr. Conforti's medical care. <i>See</i> Declaration of Jaclyn M. Palmerson ("Palmerson Decl.") ¶ 5.</p>	<p>confidential medical and personal information about Mr. Conforti and undermine Mr. Conforti's rights and interests in keeping such information private. Further, such publication would harm Mr. Conforti's trust and confidential relationships with his medical providers and jeopardize his ability to seek medical care without fear that the information he provides would become public.</p> <p>Further, these medical records are presently confidential and unavailable to the public. If this request to seal is not granted, the disclosure of this information would cause significant harm to Mr. Conforti, his rights, and</p>	<p>redacted information does not provide the protections required for such sensitive and/or restricted information. <i>See</i> Palmerson Decl. ¶ 7.</p>		

Material	Legitimate Public or Private Interest Warranting Relief	Clearly Defined and Serious Injury that Would Result if the Relief is Not Granted	Why a Less Restrictive Alternative to the Relief Sought is Not Available	Any Prior Order Sealing the Same Materials in the Pending Action	Party in Opposition to Sealing, if any, and Basis
		his privacy interests. <i>See</i> Palmerson Decl. ¶ 6.			
Hearing Transcript p. 39, lines 20-24	<p>Mr. Conforti requests sealing of the redacted information on page 39, lines 20-24 of the hearing transcript from his Motion to Quash and for a Protective Order, (Dkt. 70), because it is comprised of Mr. Conforti's highly sensitive medical and mental health history.</p> <p>This information includes diagnoses pertaining to Mr. Conforti's medical care. <i>See</i> Declaration of Jaclyn M. Palmerson ("Palmerson Decl.") ¶ 5.</p>	<p>If filed unredacted on the public docket, this section of the transcript will reveal highly confidential medical and personal information about Mr. Conforti and undermine Mr. Conforti's rights and interests in keeping such information private. Further, such publication would harm Mr. Conforti's trust and confidential relationships with his medical providers and jeopardize his ability to seek medical care without fear that the information he provides would become public.</p> <p>Further, these medical records are presently confidential and unavailable to the public. If this request to seal is not</p>	Mr. Conforti maintains that any alternative to sealing the redacted information does not provide the protections required for such sensitive and/or restricted information. <i>See</i> Palmerson Decl. ¶ 7.	<i>See</i> the February 4 Sealing Order. (Dkt. 68).	None.

Material	Legitimate Public or Private Interest Warranting Relief	Clearly Defined and Serious Injury that Would Result if the Relief is Not Granted	Why a Less Restrictive Alternative to the Relief Sought is Not Available	Any Prior Order Sealing the Same Materials in the Pending Action	Party in Opposition to Sealing, if any, and Basis
		granted, the disclosure of this information would cause significant harm to Mr. Conforti, his rights, and his privacy interests. <i>See</i> Palmerson Decl. ¶ 6.			
Hearing Transcript p. 42, lines 10-11	<p>Mr. Conforti requests sealing of the redacted information on page 42, lines 10-11 of the hearing transcript from his Motion to Quash and for a Protective Order, (Dkt. 70), because it is comprised entirely of Mr. Conforti's highly sensitive medical and history.</p> <p>This information includes diagnoses pertaining to Mr. Conforti's medical care. <i>See</i> Declaration of Jaclyn M. Palmerson ("Palmerson Decl.") ¶ 5.</p>	If filed unredacted on the public docket, lines 10-11 on p. 42 will reveal highly confidential medical and personal information about Mr. Conforti and undermine Mr. Conforti's rights and interests in keeping such information private. Further, such publication would harm Mr. Conforti's trust and confidential relationships with his medical providers and jeopardize his ability to seek medical care without fear that the information he provides would become public.	Mr. Conforti maintains that any alternative to sealing the redacted information does not provide the protections required for such sensitive and/or restricted information. <i>See</i> Palmerson Decl. ¶ 7.	<i>See</i> the February 4 Sealing Order. (Dkt. 68).	None.

Material	Legitimate Public or Private Interest Warranting Relief	Clearly Defined and Serious Injury that Would Result if the Relief is Not Granted	Why a Less Restrictive Alternative to the Relief Sought is Not Available	Any Prior Order Sealing the Same Materials in the Pending Action	Party in Opposition to Sealing, if any, and Basis
		Further, these medical records are presently confidential and unavailable to the public. If this request to seal is not granted, the disclosure of this information would cause significant harm to Mr. Conforti, his rights, and his privacy interests. <i>See</i> Palmerson Decl. ¶ 6.			
Hearing Transcript p. 43, lines 21-24	Mr. Conforti requests sealing of the redacted information on page 43, lines 21-24 of the hearing transcript from his Motion to Quash and for a Protective Order, (Dkt. 70), because it is comprised entirely of Mr. Conforti's highly sensitive medical and mental health history. This information includes diagnoses and medications pertaining to Mr. Conforti's medical care. <i>See</i> Declaration of Jaclyn M.	If filed unredacted on the public docket, lines 21-24 of p. 43 will reveal highly confidential medical and personal information about Mr. Conforti and undermine Mr. Conforti's rights and interests in keeping such information private. Further, such publication would harm Mr. Conforti's trust and confidential relationships with his medical providers and jeopardize his ability to seek medical care without	Mr. Conforti maintains that any alternative to sealing the redacted information does not provide the protections required for such sensitive and/or restricted information. <i>See</i> Palmerson Decl. ¶ 7.	<i>See</i> the February 4 Sealing Order. (Dkt. 68).	None.

Material	Legitimate Public or Private Interest Warranting Relief	Clearly Defined and Serious Injury that Would Result if the Relief is Not Granted	Why a Less Restrictive Alternative to the Relief Sought is Not Available	Any Prior Order Sealing the Same Materials in the Pending Action	Party in Opposition to Sealing, if any, and Basis
	Palmerson (“Palmerson Decl.”) ¶ 5.	<p>fear that the information he provides would become public.</p> <p>Further, these medical records are presently confidential and unavailable to the public. If this request to seal is not granted, the disclosure of this information would cause significant harm to Mr. Conforti, his rights, and his privacy interests. <i>See</i> Palmerson Decl. ¶ 6.</p>			
Hearing Transcript p. 44, lines 13-16	Mr. Conforti requests sealing of the redacted information on page 44, lines 13-16 of the hearing transcript from his Motion to Quash and for a Protective Order, (Dkt. 70), because it is comprised entirely of Mr. Conforti’s highly sensitive medical and mental health history.	If filed unredacted on the public docket, lines 13-16 on page 44 of the hearing transcript will reveal highly confidential medical and personal information about Mr. Conforti and undermine Mr. Conforti’s rights and interests in keeping such information private. Further, such publication would harm	Mr. Conforti maintains that any alternative to sealing the redacted information does not provide the protections required for such sensitive and/or restricted information.	<i>See</i> the February 4 Sealing Order. (Dkt. 68).	None.

Material	Legitimate Public or Private Interest Warranting Relief	Clearly Defined and Serious Injury that Would Result if the Relief is Not Granted	Why a Less Restrictive Alternative to the Relief Sought is Not Available	Any Prior Order Sealing the Same Materials in the Pending Action	Party in Opposition to Sealing, if any, and Basis
	<p>This information includes diagnoses and medications prescribed for Mr. Conforti's medical care. <i>See</i> Declaration of Jaclyn M. Palmerson ("Palmerson Decl.") ¶ 5.</p>	<p>Mr. Conforti's trust and confidential relationships with his medical providers and jeopardize his ability to seek medical care without fear that the information he provides would become public.</p> <p>Further, these medical records are presently confidential and unavailable to the public. If this request to seal is not granted, the disclosure of this information would cause significant harm to Mr. Conforti, his rights, and his privacy interests. <i>See</i> Palmerson Decl. ¶ 6.</p>	<p><i>See</i> Palmerson Decl. ¶ 7.</p>		
<p>Hearing Transcript p. 44, lines 20-23</p>	<p>Mr. Conforti requests sealing of the redacted information on page 44, lines 20-23 of the hearing transcript from his Motion to Quash and for a Protective Order, (Dkt. 70), because it is comprised</p>	<p>If filed unredacted on the public docket, lines 20-23 on page 44 of the hearing transcript will reveal highly confidential medical and personal information about Mr. Conforti and</p>	<p>Mr. Conforti maintains that any alternative to sealing the redacted information does not provide</p>	<p><i>See</i> the February 4 Sealing Order. (Dkt. 68).</p>	<p>None.</p>

Material	Legitimate Public or Private Interest Warranting Relief	Clearly Defined and Serious Injury that Would Result if the Relief is Not Granted	Why a Less Restrictive Alternative to the Relief Sought is Not Available	Any Prior Order Sealing the Same Materials in the Pending Action	Party in Opposition to Sealing, if any, and Basis
	<p>entirely of Mr. Conforti’s highly sensitive medical and mental health history.</p> <p>This information includes diagnoses and medicines prescribed pertaining to Mr. Conforti’s medical care. <i>See</i> Declaration of Jaclyn M. Palmerson (“Palmerson Decl.”) ¶ 5.</p>	<p>undermine Mr. Conforti’s rights and interests in keeping such information private. Further, such publication would harm Mr. Conforti’s trust and confidential relationships with his medical providers and jeopardize his ability to seek medical care without fear that the information he provides would become public.</p> <p>Further, these medical records are presently confidential and unavailable to the public. If this request to seal is not granted, the disclosure of this information would cause significant harm to Mr. Conforti, his rights, and his privacy interests. <i>See</i> Palmerson Decl. ¶ 6.</p>	<p>the protections required for such sensitive and/or restricted information. <i>See</i> Palmerson Decl. ¶ 7.</p>		

Material	Legitimate Public or Private Interest Warranting Relief	Clearly Defined and Serious Injury that Would Result if the Relief is Not Granted	Why a Less Restrictive Alternative to the Relief Sought is Not Available	Any Prior Order Sealing the Same Materials in the Pending Action	Party in Opposition to Sealing, if any, and Basis
Hearing Transcript p. 49, lines 7-11	<p>Mr. Conforti requests sealing of the redacted information on page 49, lines 7-11 of the hearing transcript from his Motion to Quash and for a Protective Order, (Dkt. 70), because it is comprised entirely of Mr. Conforti's highly sensitive medical and mental health history.</p> <p>This information includes dates and diagnoses pertaining to Mr. Conforti's medical care. <i>See</i> Declaration of Jaclyn M. Palmerson ("Palmerson Decl.") ¶ 5.</p>	<p>If filed unredacted on the public docket, lines 7-11 on page 49 of the hearing transcript of the hearing transcript will reveal highly confidential medical and personal information about Mr. Conforti and undermine Mr. Conforti's rights and interests in keeping such information private. Further, such publication would harm Mr. Conforti's trust and confidential relationships with his medical providers and jeopardize his ability to seek medical care without fear that the information he provides would become public.</p> <p>Further, these medical records are presently confidential and unavailable to the public. If this request to seal is not</p>	<p>Mr. Conforti maintains that any alternative to sealing the redacted information does not provide the protections required for such sensitive and/or restricted information. <i>See</i> Palmerson Decl. ¶ 7.</p>	<p><i>See</i> the February 4 Sealing Order. (Dkt. 68).</p>	<p>None.</p>

Material	Legitimate Public or Private Interest Warranting Relief	Clearly Defined and Serious Injury that Would Result if the Relief is Not Granted	Why a Less Restrictive Alternative to the Relief Sought is Not Available	Any Prior Order Sealing the Same Materials in the Pending Action	Party in Opposition to Sealing, if any, and Basis
		granted, the disclosure of this information would cause significant harm to Mr. Conforti, his rights, and his privacy interests. <i>See</i> Palmerson Decl. ¶ 6.			
Hearing Transcript p. 58, lines 13-14	Mr. Conforti requests sealing of the redacted information on page 58, lines 13-14 of the hearing transcript from his Motion to Quash and for a Protective Order, (Dkt. 70), because it is comprised entirely of Mr. Conforti's highly sensitive personal information.	If filed unredacted on the public docket, lines 13-14 on page 58 of the hearing transcript will reveal highly confidential personal information about Mr. Conforti and undermine Mr. Conforti's rights and interests in keeping such information private. Further, such publication would harm Mr. Conforti's trust and confidential relationships with his medical providers and jeopardize his ability to seek medical care without fear that the information he provides would become public.	Mr. Conforti maintains that any alternative to sealing the redacted information does not provide the protections required for such sensitive and/or restricted information. <i>See</i> Palmerson Decl. ¶ 7.	<i>See</i> the February 4 Sealing Order. (Dkt. 68).	None.

Material	Legitimate Public or Private Interest Warranting Relief	Clearly Defined and Serious Injury that Would Result if the Relief is Not Granted	Why a Less Restrictive Alternative to the Relief Sought is Not Available	Any Prior Order Sealing the Same Materials in the Pending Action	Party in Opposition to Sealing, if any, and Basis
		Further, this information is presently confidential and unavailable to the public. If this request to seal is not granted, the disclosure of this information would cause significant harm to Mr. Conforti, his rights, and his privacy interests. <i>See</i> Palmerson Decl. ¶ 6.			
Hearing Transcript p. 61, lines 17-18	Mr. Conforti requests sealing of the redacted information on page 61, lines 17-18 of the hearing transcript from his Motion to Quash and for a Protective Order, (Dkt. 70), because it is comprised entirely of Mr. Conforti's highly sensitive medical and mental health history.	If filed unredacted on the public docket, lines 17-19 on page 61 of the hearing transcript will reveal highly confidential medical and personal information about Mr. Conforti and undermine Mr. Conforti's rights and interests in keeping such information private. Further, such publication would harm Mr. Conforti's trust and confidential relationships with his medical providers and jeopardize his ability to seek medical care without	Mr. Conforti maintains that any alternative to sealing the redacted information does not provide the protections required for such sensitive and/or restricted information. <i>See</i> Palmerson Decl. ¶ 7.	<i>See</i> the February 4 Sealing Order. (Dkt. 68).	None.

Material	Legitimate Public or Private Interest Warranting Relief	Clearly Defined and Serious Injury that Would Result if the Relief is Not Granted	Why a Less Restrictive Alternative to the Relief Sought is Not Available	Any Prior Order Sealing the Same Materials in the Pending Action	Party in Opposition to Sealing, if any, and Basis
		<p>fear that the information he provides would become public.</p> <p>Further, these medical records are presently confidential and unavailable to the public. If this request to seal is not granted, the disclosure of this information would cause significant harm to Mr. Conforti, his rights, and his privacy interests. <i>See</i> Palmerson Decl. ¶ 6.</p>			
Hearing Transcript p. 63, lines 4-5	Mr. Conforti requests sealing of the redacted information on page 63, lines 4-5 of the hearing transcript from his Motion to Quash and for a Protective Order, (Dkt. 70), because it is comprised entirely of Mr. Conforti's highly sensitive medical and mental health history.	If filed unredacted on the public docket, lines 4-5 on page 63 of the hearing transcript will reveal highly confidential medical and personal information about Mr. Conforti and undermine Mr. Conforti's rights and interests in keeping such information private. Further, such publication would harm	Mr. Conforti maintains that any alternative to sealing the redacted information does not provide the protections required for such sensitive and/or restricted information.	<i>See</i> the February 4 Sealing Order. (Dkt. 68).	None.

Material	Legitimate Public or Private Interest Warranting Relief	Clearly Defined and Serious Injury that Would Result if the Relief is Not Granted	Why a Less Restrictive Alternative to the Relief Sought is Not Available	Any Prior Order Sealing the Same Materials in the Pending Action	Party in Opposition to Sealing, if any, and Basis
	<p>This information includes dates and diagnoses pertaining to Mr. Conforti's medical care. <i>See</i> Declaration of Jaclyn M. Palmerson ("Palmerson Decl.") ¶ 5.</p>	<p>Mr. Conforti's trust and confidential relationships with his medical providers and jeopardize his ability to seek medical care without fear that the information he provides would become public.</p> <p>Further, these medical records are presently confidential and unavailable to the public. If this request to seal is not granted, the disclosure of this information would cause significant harm to Mr. Conforti, his rights, and his privacy interests. <i>See</i> Palmerson Decl. ¶ 6.</p>	<p><i>See</i> Palmerson Decl. ¶ 7.</p>		
<p>Hearing Transcript p. 63, lines 17-19</p>	<p>Mr. Conforti requests sealing of the redacted information on page 63, lines 17-19 of the hearing transcript from his Motion to Quash and for a Protective Order, (Dkt. 70), because it is comprised</p>	<p>If filed unredacted on the public docket, lines 17-19 on page 63 of the hearing transcript will reveal highly confidential medical and personal information about Mr. Conforti and</p>	<p>Mr. Conforti maintains that any alternative to sealing the redacted information does not provide</p>	<p><i>See</i> the February 4 Sealing Order. (Dkt. 68).</p>	<p>None.</p>

Material	Legitimate Public or Private Interest Warranting Relief	Clearly Defined and Serious Injury that Would Result if the Relief is Not Granted	Why a Less Restrictive Alternative to the Relief Sought is Not Available	Any Prior Order Sealing the Same Materials in the Pending Action	Party in Opposition to Sealing, if any, and Basis
	<p>entirely of Mr. Conforti's highly sensitive medical and mental health history.</p> <p>This information includes dates and prescriptions pertaining to Mr. Conforti's medical care. <i>See</i> Declaration of Jaclyn M. Palmerson ("Palmerson Decl.") ¶ 5.</p>	<p>undermine Mr. Conforti's rights and interests in keeping such information private. Further, such publication would harm Mr. Conforti's trust and confidential relationships with his medical providers and jeopardize his ability to seek medical care without fear that the information he provides would become public.</p> <p>Further, these medical records are presently confidential and unavailable to the public. If this request to seal is not granted, the disclosure of this information would cause significant harm to Mr. Conforti, his rights, and his privacy interests. <i>See</i> Palmerson Decl. ¶ 6.</p>	<p>the protections required for such sensitive and/or restricted information. <i>See</i> Palmerson Decl. ¶ 7.</p>		

Material	Legitimate Public or Private Interest Warranting Relief	Clearly Defined and Serious Injury that Would Result if the Relief is Not Granted	Why a Less Restrictive Alternative to the Relief Sought is Not Available	Any Prior Order Sealing the Same Materials in the Pending Action	Party in Opposition to Sealing, if any, and Basis
Hearing Transcript p. 64, line 9	Mr. Conforti requests sealing of the redacted information on page 64, line 9 of the hearing transcript from his Motion to Quash and for a Protective Order, (Dkt. 70), because it is comprised entirely of Mr. Conforti's highly sensitive medical history.	<p>If filed unredacted on the public docket, line 9 on page 64 of the hearing transcript will reveal highly confidential medical and personal information about Mr. Conforti and undermine Mr. Conforti's rights and interests in keeping such information private. Further, such publication would harm Mr. Conforti's trust and confidential relationships with his medical providers and jeopardize his ability to seek medical care without fear that the information he provides would become public.</p> <p>Further, these medical records are presently confidential and unavailable to the public. If this request to seal is not granted, the disclosure of</p>	Mr. Conforti maintains that any alternative to sealing the redacted information does not provide the protections required for such sensitive and/or restricted information. <i>See</i> Palmerson Decl. ¶ 7.	<i>See</i> the February 4 Sealing Order. (Dkt. 68).	None.

Material	Legitimate Public or Private Interest Warranting Relief	Clearly Defined and Serious Injury that Would Result if the Relief is Not Granted	Why a Less Restrictive Alternative to the Relief Sought is Not Available	Any Prior Order Sealing the Same Materials in the Pending Action	Party in Opposition to Sealing, if any, and Basis
		this information would cause significant harm to Mr. Conforti, his rights, and his privacy interests. <i>See</i> Palmerson Decl. ¶ 6.			
Hearing Transcript p. 65, line 25	Mr. Conforti requests sealing of the redacted information on page 65, line 25 of the hearing transcript from his Motion to Quash and for a Protective Order, (Dkt. 70), because it is comprised entirely of Mr. Conforti's highly sensitive medical history.	If filed unredacted on the public docket, lines 25 on page 65 of the hearing transcript will reveal highly confidential medical and personal information about Mr. Conforti and undermine Mr. Conforti's rights and interests in keeping such information private. Further, such publication would harm Mr. Conforti's trust and confidential relationships with his medical providers and jeopardize his ability to seek medical care without fear that the information he provides would become public.	Mr. Conforti maintains that any alternative to sealing the redacted information does not provide the protections required for such sensitive and/or restricted information. <i>See</i> Palmerson Decl. ¶ 7.	<i>See</i> the February 4 Sealing Order. (Dkt. 68).	None.

Material	Legitimate Public or Private Interest Warranting Relief	Clearly Defined and Serious Injury that Would Result if the Relief is Not Granted	Why a Less Restrictive Alternative to the Relief Sought is Not Available	Any Prior Order Sealing the Same Materials in the Pending Action	Party in Opposition to Sealing, if any, and Basis
		Further, these medical records are presently confidential and unavailable to the public. If this request to seal is not granted, the disclosure of this information would cause significant harm to Mr. Conforti, his rights, and his privacy interests. <i>See</i> Palmerson Decl. ¶ 6.			
Hearing Transcript p. 67, lines 23-25	Mr. Conforti requests sealing of the redacted information on page 67, lines 23-25 of the hearing transcript from his Motion to Quash and for a Protective Order, (Dkt. 70), because it is comprised entirely of Mr. Conforti's highly sensitive medical and mental health history. This information includes dates and diagnoses pertaining to Mr. Conforti's medical care. <i>See</i> Declaration of Jaclyn M.	If filed unredacted on the public docket, lines 23-25 on page 67 of the hearing transcript will reveal highly confidential medical and personal information about Mr. Conforti and undermine Mr. Conforti's rights and interests in keeping such information private. Further, such publication would harm Mr. Conforti's trust and confidential relationships with his medical providers and jeopardize his ability to	Mr. Conforti maintains that any alternative to sealing the redacted information does not provide the protections required for such sensitive and/or restricted information. <i>See</i> Palmerson Decl. ¶ 7.	<i>See</i> the February 4 Sealing Order. (Dkt. 68).	None.

Material	Legitimate Public or Private Interest Warranting Relief	Clearly Defined and Serious Injury that Would Result if the Relief is Not Granted	Why a Less Restrictive Alternative to the Relief Sought is Not Available	Any Prior Order Sealing the Same Materials in the Pending Action	Party in Opposition to Sealing, if any, and Basis
	Palmerson (“Palmerson Decl.”) ¶ 5.	<p>seek medical care without fear that the information he provides would become public.</p> <p>Further, these medical records are presently confidential and unavailable to the public. If this request to seal is not granted, the disclosure of this information would cause significant harm to Mr. Conforti, his rights, and his privacy interests. <i>See</i> Palmerson Decl. ¶ 6.</p>			
Hearing Transcript p. 68, lines 2-6	Mr. Conforti requests sealing of the redacted information on page 68, lines 2-6 of the hearing transcript from his Motion to Quash and for a Protective Order, (Dkt. 70), because it includes Mr. Conforti’s highly sensitive medical and mental health history.	If filed unredacted on the public docket, lines 2-6 on page 68 of the hearing transcript will reveal highly confidential medical and personal information about Mr. Conforti and undermine Mr. Conforti’s rights and interests in keeping such information private. Further, such	Mr. Conforti maintains that any alternative to sealing the redacted information does not provide the protections required for such sensitive and/or restricted	<i>See</i> the February 4 Sealing Order. (Dkt. 68).	None.

Material	Legitimate Public or Private Interest Warranting Relief	Clearly Defined and Serious Injury that Would Result if the Relief is Not Granted	Why a Less Restrictive Alternative to the Relief Sought is Not Available	Any Prior Order Sealing the Same Materials in the Pending Action	Party in Opposition to Sealing, if any, and Basis
	<p>This information includes dates and diagnoses pertaining to Mr. Conforti’s medical care. <i>See</i> Declaration of Jaclyn M. Palmerson (“Palmerson Decl.”) ¶ 5.</p>	<p>publication would harm Mr. Conforti’s trust and confidential relationships with his medical providers and jeopardize his ability to seek medical care without fear that the information he provides would become public.</p> <p>Further, these medical records are presently confidential and unavailable to the public. If this request to seal is not granted, the disclosure of this information would cause significant harm to Mr. Conforti, his rights, and his privacy interests. <i>See</i> Palmerson Decl. ¶ 6.</p>	<p>information. <i>See</i> Palmerson Decl. ¶ 7.</p>		