



Temporary Restraining Order redacting certain information to maintain the confidentiality of foster children's information.

4. The City's TRO Opposition includes certain confidential information regarding one child in foster care that requires redacting in the publicly available document and filing unredacted copies under seal.

5. Specifically, Exhibits 1-A, 1-B, 1-C, 1-D, 3-A, and 3-B, contain confidential personal information belonging to the child, including DHS records, case notes, and other personal information. These documents are confidential materials from a foster care child's records and the City seeks leave to file these documents under seal.

6. The City's Memorandum and Exhibit 1 include references to the information cited in Paragraph 5 and also requires redaction to preserve the confidential information.

7. Unredacted versions of each of the above should be filed under seal and the City seeks leave to file these documents under seal.

8. Pursuant to the Federal Rules of Civil Procedure 5.2(d), the Court "may order that a filing be made under seal without redactions."

9. The purpose of filing the documents under seal is to keep a foster child's confidential information out of the public realm in compliance with applicable Pennsylvania Laws.

10. The City will share unredacted copies of these documents with Plaintiffs' counsel after filing this Motion and the redacted documents.

For the reasons stated above, the City respectfully request that the Court grant this motion and permit the City to file the confidential information and documents

under seal.

Respectfully submitted,

CITY OF PHILADELPHIA LAW DEPARTMENT  
Marcel Pratt, City Solicitor

Date: June 12, 2018

By: /s/ Diana Cortes

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*Counsel for Defendants*

**CERTIFICATE OF SERVICE**

I, Benjamin H. Field, hereby certify that on June 12, 2018, I caused a true and correct copy of the foregoing Motion for Leave to File Documents Under Seal, to be served via CM/ECF filing upon counsel for all parties.

By: /s/ Benjamin H. Field  
Benjamin H. Field

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

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SHARONELL FULTON, CECELIA PAUL,	:	
TONI LYNN SIMMS-BUSCH, AND	:	
CATHOLIC SOCIAL SERVICES,	:	
	:	
Plaintiffs,	:	Civil Action
	:	No. 18-cv-2075
v.	:	
	:	
CITY OF PHILADELPHIA,	:	
DEPARTMENT OF HUMAN SERVICES	:	
FOR THE CITY OF PHILADELPHIA, and	:	
PHILADELPHIA COMMISSION ON	:	
HUMAN RELATIONS	:	
	:	
Defendants.	:	

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**[PROPOSED] ORDER GRANTING THE CITY PARTIES’  
MOTION FOR LEAVE TO FILE DOCUMENTS UNDER SEAL**

**AND NOW**, this \_\_\_\_\_ day of \_\_\_\_\_ 2018, upon consideration of the City Parties’ Motion for Leave to File Documents Under Seal, it is **HEREBY ORDERED** that the Motion is **GRANTED** and that the documents labeled as Exhibits 1-A, 1-B, 1-C, 1-D, and 3-A, to the Memorandum in Opposition to Plaintiffs’ Motion for a Temporary Restraining Order and Preliminary Injunction, as well as unredacted versions of the City Parties’ Memorandum and Exhibit 1 are to be **PLACED UNDER SEAL** by the Clerk of the Court.

BY THE COURT

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The Honorable Petrese B. Tucker