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6	TULARE, JULIA LANGLEY, CAROL HELDING and JOHN ROZUM	
7		
8	UNITED STATES DISTRICT COURT	
9	EASTERN DISTRICT OF CALIFORNIA, FRESNO DIVISION	
10		
11	PAMELA J. FOX, ON BEHALF OF HERSELF AND AS NEXT FRIEND TO	Case No. 1:11-CV-00520 AWI SMS
12	C.M.R., A MINOR,	NOTICE AND REQUEST TO SEAL DOCUMENTS RE DEFENDANTS
13	Plaintiffs,	COUNTY OF TULARE, JULIA LANGLEY, CAROL HELDING AND
14	v.	JOHN ROZUM'S OPPOSITION TO MOTION TO FILE SECOND AMENDED
15	COUNTY OF TULARE, LETICIA CASTENEDA, ERICA SOTO, RON	COMPLAINT AND ORDER THEREON
16	CASTENEDA, JULIA LANGLEY, CAROL HELDING, JOHN ROZUM, STEVEN D.	Judge: Hon. Magistrate Sandra M. Snyder Date: November 20, 2013
17	ROGERS, and DOES 1-100,	Time: 1:00 pm
18	Defendant.	Dept.: 1
19		
20	Defendants, County of Tulare, Julia Langley, Carol Helding, and John Rozum ("Defendants"),	
21	hereby request an Order to file the attached documents under seal pursuant to U.S. District Court,	
22	Eastern District Court Local Rule 141.	
23	The sealed documents include confidential portions of deposition transcripts and Court filings	
24	in this matter and in the underlying family law proceedings and Tulare County Sheriff's Department	
25	records, specifically:	
26	1. Exhibit "A" to Declaration of Michael G. Woods – Portions of the deposition transcript	
27	of Carol Helding;	
28		
MCCORMICK, BARSTOW, SHEPPARD, WAYTE & CARRUTH LLP 7647 N FRESNO STREET FRESNO, CA 93720	85560-00066 2728310.1 NOTICE AND REQUEST TO SEAL DOCUMENTS RE COUNTY OF TULARE, JULIA LANGLEY, CAROL HELDING AND JOHN ROZUM'S OPPOSITION TO MOTION TO FILE SECOND AMENDED COMPLAINT AND ORDER THEREON Dockets.Justia.co	

1	2. Exhibit "B" to Declaration of Michael G. Woods – Portions of the deposition	
2	transcripts of Plaintiff Pamela Fox;	
3	3. Exhibit "D" to Declaration of Michael G. Woods – Search Warrant;	
4	4. Exhibit "G" to Declaration of Michael G. Woods - Portions of the deposition transcript	
5	of Lourdes Dawson;	
6	5. Exhibit "N" to Request for Judicial Notice – Civil Subpoena (Deuces Tecum) and	
7	Declaration in Support of Civil Subpoena;	
8	6. Exhibit "S" to Request for Judicial Notice – Request for Judicial Notice of Conviction	
9	record.	
10	Given the confidential nature of the proceedings and the protective orders issued in this Court	
11	and in Tulare County Superior Court, it is requested that the above exhibits be filed with the Court	
12	under seal.	
13	Dated: November 7, 2013 McCORMICK, BARSTOW, SHEPPARD,	
14	WAYTE & CARRUTH LLP	
15		
16	Bv: /s/ Deborah A. Byron Michael G. Woods	
17	Deborah A. Byron	
18	Attorneys for Defendants COUNTY OF TULARE, JULIA LANGLEY, CAROL HELDING and JOHN	
19	ROZUM	
20	<u>ORDER</u>	
21	GOOD CAUSE APPEARING THEREFOR, IT IS HEREBY ORDERED THAT THE ABOVE-	
22	LISTED EXHIBITS BE FILED UNDER SEAL.	
23	IT IS SO ORDERED.	
24	Dated: November 8, 2013	
25		
26	By: /s/ SANDRA M. SNYDER	
27	The Honorable Sandra M. Snyder United States Magistrate Judge	
28		
McCormick, Barstow,	85560-00066 2728310.1 2 NOTICE AND REQUEST TO SEAL DOCUMENTS RE COUNTY OF TULARE, JULIA LANGLEY, CAROL	