

1 Michael G. Woods, #58683  
Deborah A. Byron, #105327  
2 McCormick, Barstow, Sheppard,  
Wayte & Carruth LLP  
3 7647 N Fresno Street  
Fresno, California 93720  
4 Telephone: (559) 433-1300  
Facsimile: (559) 433-2300  
5

6 Attorneys for Defendants COUNTY OF  
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  
12 C.M.R., A MINOR,

13 Plaintiffs,

14 v.

15 COUNTY OF TULARE, LETICIA  
CASTANEDA, ERICA SOTO, RON  
16 CASTANEDA, JULIA LANGLEY, CAROL  
HELDING, JOHN ROZUM, STEVEN D.  
17 ROGERS, and DOES 1-100,

18 Defendants.  
19

Case No. 1:11-CV-00520 AWI SMS

**NOTICE AND REQUEST TO SEAL  
DOCUMENTS RE DEFENDANTS  
COUNTY OF TULARE, JULIA  
LANGLEY, CAROL HELDING AND  
JOHN ROZUM'S MOTION FOR  
SUMMARY JUDGMENT/SUMMARY  
ADJUDICATION AND ORDER  
THEREON**

Judge: Hon. Anthony W. Ishii  
Date: March 3, 2014  
Time: 1:30 pm  
Dept.: 2 – 8<sup>th</sup> Floor

20 Defendants, County of Tulare, Julia Langley, Carol Holding, 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 documents and Court filings in the underlying  
24 family law proceedings, Court filings in the underlying juvenile proceedings, Tulare County District  
25 Attorney records, Tulare County Health and Human Services Child Welfare Services documents and  
26 Tulare County Sheriff’s Department records, which are listed in Defendants’ Statement of Evidence  
27 specifically as:  
28

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

<b>EXHIBIT</b>	<b>DESCRIPTION OF EVIDENCE</b>
D-8	July 29, 2008 Order
D-9	August 11, 2008 Felony Rejection Summary
D-10	August 19, 2008 Order
D-12	October 22, 2008 Order
D-13	December 9, 2008 Order
D-14	May 12, 2009 Order
D-15	Reporter's transcript of hearing - August 24, 2009
D-16	July 6, 2009 Order
D-17	July 22, 2009 Order
D-18	Reporter's transcript of hearing – July 22, 2009
D-19	August 20, 2009 Order
D-20	September 2, 2009 Order
D-21	Reporter's transcript of hearing – September 2, 2009
D-22	September 8, 2009 Order
D-23	Reporter's transcript of hearing – September 8, 2009
D-24	September 18, 2009 Order
D-25	Reporter's transcript of hearing – September 18, 2009
D-26	November 12, 2009 Order
D-27	Reporter's transcript of hearing – November 12, 2009
D-28	Reporter's transcript of hearing – December 2, 2009
D-29	December 7, 2009 Order
D-30	December 15, 2009 Order
D-31	January 4, 2010 Order
D-32	January 15, 2010 Order
D-33	Reporter's transcript of hearing – January 15, 2010
D-34	February 24, 2010 Order

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

<b>EXHIBIT</b>	<b>DESCRIPTION OF EVIDENCE</b>
D-35	March 4, 2010 Order
D-36	March 16, 2010 Order
D-37	March 30, 2010 Order
D-38	April 16, 2010 Order
D-39	June 15, 2010 Order
D-40	September 30, 2010 Order
D-41	Search Warrant and Return; Order Sealing Warrant
D-43	Government Tort Claim filed 9/17/2010
D-44	Government Tort Claim filed 10/14/10
D-45	September 11, 2009 Letter to Seth Goldstein from Julia Langley
D-47	June 25, 2010 Letter to Ann Konda, Alternative Services
D-49	Report of abuse, unfounded – June 8, 2007
D-50	October 18, 2007 Family Court Order
D-51	Mediation Report – Beth Wallace, Family Court Services October 9, 2009
D-53	Reporter’s transcript of hearing – December 15, 2009
D-54	Reporter’s transcript of hearing – May 12, 2009
D-55	Mediation Report – Lourdes Dawson – April 30, 2009
D-56	ProLaw note prepared by Carol Holding, December 3, 2008.
D-57	ProLaw note prepared by Carol Holding, July 15, 2009.
D-58	E-mail addressed to Leticia Castaneda and Erica Soto from John Rozum, dated December 4, 2008.
D-60	Reporter’s Transcript of Hearing – October 22, 2008
D-62	Reporter’s transcript of hearing – October 20, 2009.
D-63	October 22, 2009 - Ruling Denying Petition To Obtain Reports Of Law Enforcement And Other Documents

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

Given the confidential nature of the proceedings and the protective orders issued in this Court and in Tulare County Superior Court, it is requested that the above exhibits be filed with the Court under seal.

Dated: January 21, 2014

McCORMICK, BARSTOW, SHEPPARD,  
WAYTE & CARRUTH LLP

By:                   /s/ Deborah A. Byron                    
                  Michael G. Woods  
                  Deborah A. Byron  
Attorneys for Defendants COUNTY OF TULARE,  
JULIA LANGLEY, CAROL HELDING and JOHN  
                  ROZUM

**ORDER**

GOOD CAUSE APPEARING THEREFOR, IT IS HEREBY ORDERED THAT THE ABOVE-  
LISTED EXHIBITS BE FILED UNDER SEAL.

IT IS SO ORDERED.

Dated: January 22, 2014

  
SENIOR DISTRICT JUDGE