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13 Attorney for PlaintiffS Pamela FOX and C.M.R.

14 **IN THE UNITED STATES DISTRICT COURT**  
15 **FOR THE EASTERN DISTRICT OF CALIFORNIA**

16 **PAMELA J. FOX, ON BEHALF OF**  
17 **HERSELF AND AS NEXT FRIEND TO**  
18 **C.M.R., A MINOR**

19 Plaintiffs,

20 vs.

21 **COUNTY OF TULARE, LETICIA**  
22 **CASTANEDA, ERICA SOTO, RON**  
23 **CASTANEDA, JULIA LANGELY,**  
24 **CAROL HELDING, JOHN ROZUM,**  
25 **STEVEN D. ROGERS,**

26 Defendants.

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

28 ) **PLAINTIFF’S SECOND REQUEST TO**  
29 **SEAL DOCUMENTS; ORDER**

30 Plaintiffs, Pamela Fox and C.M.R. hereby request an Order to file the attached documents  
31 under seal pursuant to U.S. District Court Eastern District Local Rule 141.

32 The sealed documents include confidential documentation and Court filings from the  
33 underlying litigation in the Family Law Courts or Tulare County Superior and Juvenile Division  
34 of the Courts. Tulare County Sheriff’s and Welfare Services reports, documents and records were  
35 ordered to be confidential and are necessary for Plaintiff’s response to the Motions for Summary  
36 Adjudication. Given the confidential nature and the governing protective orders of the Superior  
37 Court, the documents are being filed under seal.

1 Court requiring they be maintained as confidential, Plaintiff hereby, respectfully, requests that the  
2 Court make such an order.

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4 Respectfully submitted,

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6 Originally Dated: May 7, 2014

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8 Resubmitted: March 4, 2015

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The Law Offices of Seth L. Goldstein

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/s/ Seth L. Goldstein

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Seth L. Goldstein

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**ORDER**

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15 **GOOD CAUSE APPEARING**, therefore, it is hereby ordered that the following listed exhibits

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17 be filed under seal;

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1. 117 7/6/10 ltr from SG to Judge Vortmann

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2. 118 Resubmitted and modified Withdrawal of Motion for Attorney's Fees  
3/29/10 w/ letter from SG to JL and Carol Holding

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3. 120 Amended 8/14/08 TC HHS A Admission Data Sheet

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4. 132 Amended Juvenile Exhibit Records #5 and #9 copied  
in its entirety consisting of 702 pages from the Superior  
Court file

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5. 158 Amended Tulare County HHS CWS Policy,  
Overview of Emergency Response Program

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6. 161 Det. Porter's Rpt on Rogers' hard drive

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7. 162 Tulare County Sheriff's Department General Order

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8. 163 Emergency Response Referral Information 6/8/07

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9. 164 CWS Policies

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10. 165 Lou Dawson Addendum Report for 5/12/09 Hearing

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- 11. 166 SCAR of 5/4/07 and Sheriff's Investigative Reports
- 12. 167 Declaration of Detective Christopher Porter 12/9/10
- 13. 168 Billing Statements from Mr. Goldstein to Plaintiff Fox
- 14. 169 Deposition of Clyde Tillery
- 15. 170 Plaintiffs' Points and Authorities in Response to Opposition by County Counsel to Unseal Search Warrant 10/19/09
- 16. 171 FAOH 10/22/08
- 17. 172 Plaintiff's Amended Response to RPD Set One
- 18. 173 FAOH 7/22/09
- 19. 174 County's Petition for Release of Juvenile Court File 11/10/10
- 20. 175 Petition and Order to Obtain Report of LEA for Kristi Rogers 3/5/10
- 21. 176 Emergency Response Referral Information 12/3/08
- 22. 177 List of docs withheld from Goldstein document packets (no date)
- 23. 178 Reporter's Transcript 1/4/10
- 24. 179 12/4/08 letter of complaint from P. Fox to Porterville CWS
- 25. 180 Emergency Response Referral Information 10/12/06. Rogers reporter
- 26. 181 Reporter's Transcript 9/30/10 Reporter's Transcript 9/30/10
- 27. 182 Plaintiffs' Points and Authorities in Support of 827 WIC Petition Signed 7/20/09
- 28. 183 Plaintiffs' Points and Authorities in Support of Second 827 WIC Petition Signed 8/28/09
- 29. 184 SCAR Report by L. Lerma 2/9/09
- 30. 185 Withdrawal of Motion for Attorney Fees and Costs and 3/23/10 Letter from Seth Goldstein to Julia Langley and Carol Holding
- 31. 186 S. Goldstein POS Declaration 12/6/10
- 32. 187 S. Goldstein Motion for Custody, 9/18/09

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- 33. 188 7/22/09 Proof of Service Request for Disclosure
- 34. 189 11/20/09 S. Goldstein First Amended Memo of Points and Authorities in Support of Renewed Motion for Custody
- 35. 190 e-mail of 12/4/08 from Rozum to L. Castenada
- 36. 191 12/8/08 Tulare County Human Services Branch CPS Records Check
- 37. 192 Subpoena Duces Tecum for Tulare County Sheriff's Dept. Custodian of Records

IT IS SO ORDERED.

Dated: March 5, 2015

  
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SENIOR DISTRICT JUDGE