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5 Attorneys for Defendant
 CHILDREN'S HOSPITAL & RESEARCH
 6 CENTER AT OAKLAND

7
 8 UNITED STATES DISTRICT COURT
 9 NORTHERN DISTRICT OF CALIFORNIA

10
 11 LATASHA WINKFIELD, as an
 Individual, and as Guardian Ad Litem and
 12 mother of Jahi McMath,

13 Plaintiff,

14 v.

15 CHILDREN'S HOSPITAL & RESEARCH
 CENTER AT OAKLAND; DR. DAVID
 16 DURAND, and Does 1-100, inclusive,

17 Defendants.

Case No. 4:13-cv-05993-SBA

**ADMINISTRATIVE MOTION TO FILE
 RECORDS UNDER SEAL**

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 19 **I. INTRODUCTION**

20 Plaintiff Latasha Winkfield is seeking declaratory relief and a temporary restraining order
 21 compelling Children's Hospital & Research Center at Oakland ("Children's Hospital") to keep
 22 Plaintiff's deceased daughter Jahi McMath on a ventilator for an indefinite period of time. A
 23 California State Court has already concluded, after three days of hearings and based on
 24 uncontroverted evidence, that Ms. McMath is, sadly, deceased. As a part of the ongoing litigation
 25 between the parties, medical information of Ms. McMath is required to be disclosed.

26 **II. ACTION REQUESTED AND REASONS IN SUPPORT OF REQUEST**

27 Children's Hospital seeks to file under seal, a reporter's transcript of in camera
 28 proceedings before the California Superior Court for the County of Alameda, as well as certain

1 exhibits received in evidence during those in camera proceedings. Portions of the transcript of
2 proceedings and exhibits were ordered sealed by the State Superior Court pursuant to California
3 Rule of Court 2.550, et seq. Therefore, Children’s Hospital seeks to file the confidential portions
4 of the transcript and confidential exhibits under seal to protect them from public disclosure. The
5 reporter’s transcript of the State court proceedings and exhibits are material to the matters in
6 dispute before this court.

7 This motion is supported by the Declaration of counsel establishing that portions of the
8 transcript are sealable, a proposed order sealing said records, a redacted and unredacted version of
9 the records to be sealed.

10 III. CONCLUSION

11 For the foregoing reasons, Children’s Hospital respectfully requests that its Administrative
12 Motion to File Records Under Seal be GRANTED.

13 Dated: January 3, 2014

ARCHER NORRIS

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15 */s/ Douglas C. Straus*

16 _____
17 Douglas C. Straus
18 Attorneys for Defendant
19 CHILDREN’S HOSPITAL & RESEARCH
20 CENTER AT OAKLAND
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