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5 Attorneys for Defendant
 6 CHILDREN’S HOSPITAL & RESEARCH
 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

**DECLARATION OF COUNSEL IN
 SUPPORT OF ADMINISTRATIVE
 MOTION TO FILE RECORDS UNDER
 SEAL**

18
 19 I, Douglas C. Straus, hereby declare:

20 1. I am counsel for CHILDREN’S HOSPITAL & RESEARCH CENTER AT
 21 OAKLAND (Children’s Hospital). If called as a witness, I would competently testify to the
 22 following facts, all of which are within my own personal knowledge.

23 2. Attached hereto as Exhibit 1 is an accurate and unredacted copy of the December
 24 24, 2013 proceedings transcribed in Alameda County Superior Court Action No. RP 13707598.
 25 Portions of those proceedings were held *in camera* and ordered sealed by the Superior Court as
 26 they concern confidential medical records of a minor.

27 3. Attached hereto as Exhibit 2 is an accurate and unredacted copy of Court Exhibit 7
 28 to the December 24, 2013 proceedings in Alameda County Superior Court Action No. RP

1 13707598. The Superior Court ordered this exhibit sealed in the court's file as it reflects the
2 medical information of a minor.

3 4. Therefore, Children's Hospital seeks to file the confidential portions of the
4 transcript, and the specified exhibit in its entirety, under seal to protect them from public
5 disclosure.

6 5. The portions of the transcript to be sealed include: pages 6 through 47, and pages
7 54 through 98. Those portions have been highlighted in Exhibit 1 and are denoted in the
8 transcript as follows: "(Following proceedings held in chambers and to remain sealed until
9 further Court Order.)"

10 6. Attached hereto as Exhibit 3 is a redacted copy of the reporter's transcript of
11 proceedings in Alameda County Superior Court Action No. RP 13707598, with the highlighted
12 portions from Exhibit 1 removed.

13 I declare under penalty of perjury under the laws of the State of California and the laws of
14 the United States that the foregoing is true and correct.

15 Executed this 3 day of January, 2014 in Walnut Creek, California.

16
17 Doug Straus / AGG
18 Douglas C. Straus

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