

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

*Granted.
Karen L. Litkovitz
10/23/18*

TERRY COLLETT,	:	Case No. 1:17-cv-295
	:	
Plaintiff,	:	
	:	Magistrate Judge Litkovitz
vs.	:	
	:	
HAMILTON COUNTY, OHIO	:	MOTION TO FILE EXHIBIT
et al.	:	UNDER SEAL
	:	
Defendants.	:	

Now come Defendants, by and through counsel, and hereby move the Court to permit the filing of an exhibit under seal in support of Defendants' Motion for Summary Judgment which is due on October 29, 2018, for the reasons more fully set forth in the memorandum below.

MEMORANDUM

The exhibit is a 17 page confidential medical record of the Plaintiff's emergency room visit which is subject to the protective order issued by the Court. (Doc.19). The exhibit is relevant to the Plaintiff's claimed injuries and the Defendant's defenses as to the extent and cause of same. The exhibit was used by Dr. Vincent D. Koenigsnecht in formulating his opinions which are expressed in his Declaration and report.

It would be difficult for the Court to evaluate the legal arguments to be made in Defendants' Motion for Summary Judgment which are based on the facts set forth in this exhibit or for a fact finder to navigate through this information if the information was only subject to