

COMMONWEALTH OF MASSACHUSETTS  
TRIAL COURT  
PROBATE AND FAMILY COURT DEPARTMENT

Hampden, ss

Docket No. 20 P 1234

Rosa Perez,

Plaintiff

v.

Jennifer Ramos,

Defendant

**Motion to Impound  
Under the Trial Court  
Impoundment Rules**

Now comes, Jennifer Ramos, the  Plaintiff  Defendant, in the above entitled action, moves that the Court impound, make unavailable for public inspection, and prevent disclosure to persons who would otherwise not have access in the course of their duties as court staff, the following information.

The entire case file. Or,

Parts of the case file, specifically my contact information:

- |  |   |
|--|---|
| <input type="checkbox"/> home address  | <input type="checkbox"/> work addresses       |
| <input type="checkbox"/> email addresses   | <input type="checkbox"/> work phone numbers   |
| <input type="checkbox"/> telephone numbers   | <input type="checkbox"/> work email addresses |
| <input type="checkbox"/> mailing addresses   | <input type="checkbox"/> school addresses,    |
| <input type="checkbox"/> child(ren)'s school addresses                                   |   |
| <input type="checkbox"/> personal and professional license and registration numbers      |   |
| <input type="checkbox"/> any and all other such identifying contact information, like my |   |

Parts of the case file, specifically any all court papers, including but not limited to pleadings, motions, and affidavits, that refer to, quote from, or paraphrase the records checked below.

Medical and mental health records from any and all sources:

mine

my child(ren)'s

- |  |
|--|
| <input type="checkbox"/> Department of Children and Family records |
| <input type="checkbox"/> Children Requiring Assistance records     |
| <input type="checkbox"/> sexual assault records                    |
| <input type="checkbox"/> school records                            |
| <input type="checkbox"/> criminal records                          |
| <input type="checkbox"/> police reports                            |

tax records

financial records

other records \_\_\_\_\_

I have good cause to believe that impoundment of the information is necessary to protect my health, safety, privacy, and well-being and of my children. See my affidavit in support of this motion.

I request that the order of impoundment remain in effect until further order of the court.

Respectfully Submitted by

Jennifer Ramos  
Name

May 1, 2021

Date

COMMONWEALTH OF MASSACHUSETTS  
TRIAL COURT  
PROBATE AND FAMILY COURT DEPARTMENT

Hampden, ss.

Docket No. 20 P 1234

Rosa Perez,

Plaintiff

v.

Jennifer Ramos,

Defendant

Proposed  
Order of Impoundment

Submitted by Jennifer Ramos  
Name of party

After a hearing on the matter and a finding of good cause, it is ordered that the following information shall be impounded and kept private by the Court:

- The entire case file. Or,
- Parts of the case file, specifically \_\_\_\_\_'s contact information:
- home address
  - email addresses
  - telephone numbers
  - mailing addresses
  - child(ren)'s school addresses
  - personal and professional license and registration numbers
  - any and all other such identifying contact information, like my \_\_\_\_\_
  - work addresses
  - work phone numbers
  - work email addresses
  - school addresses,

Parts of the case file, specifically any all court papers, including but not limited to pleadings, motions, and affidavits, that refer to, quote from, or paraphrase the records checked below.

Medical and mental health records from any and all sources:

- Jennifer Ramos
- child(ren)'s \_\_\_\_\_
- tax records
- financial records
- other records \_\_\_\_\_

- Department of Children and Family records
- Children Requiring Assistance records
- sexual assault records
- school records
- criminal records
- police report

Impounded material, documents, and information shall be kept separate from other papers in the case file and is not available for public review nor to persons who would otherwise not have access in the course of their duties as court staff.

The  Plaintiff  Defendant shall provide the impounded information to the court in an envelope marked "Impounded by order of the court dated \_\_\_\_\_"

Impounded material  is  is not available for review by the opposing party and their counsel.

\_\_\_\_\_  
Date

\_\_\_\_\_  
Justice of the Probate and Family Court

**Affidavit of Jennifer Ramos**  
**in Support of Motion to Impound**  
**Under Trial Court Impoundment Rules**

1. My name is Jennifer Ramos. My son, Malcolm is 10 years old.
2. On February 2, 2021 my mother filed for guardianship of Malcolm.
3. In the Complaint my mother told the court that my mental health issues prevent me from being able to properly take care of my son.
4. My mental health issues do not get in the way from me taking care of Malcolm.
5. In support of my case against the guardianship I plan to submit my medical records which include sensitive information about my personal life and health history. It would be harmful to me and Malcolm if these sensitive documents were available for review by members of the public that are not involved in the case.

Signed under the penalties of perjury,

May 1, 2021  
Date

  
Signature

**Motion to Impound  
Under Trial Court Impoundment Rules**

**CERTIFICATE OF SERVICE**

I, Jennifer Ramos, hereby certify that on the date May 1, 2021

a copy of the Motion to Impound, Proposed Order and Affidavit was served on

Rosa Perez

in-hand

by mail at 432 Highland Ave, Springfield, MA 01109  
address

May 1, 2021  
Date

Jennifer Ramos  
Signature

Sample