

COMMONWEALTH OF MASSACHUSETTS  
TRIAL COURT  
PROBATE AND FAMILY COURT DEPARTMENT

Worcester, ss.

Docket No. 20 W 4356

Susan Ming,  
Plaintiff

v.

David Lee,  
Defendant

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

Now comes, Susan Ming, 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:
- 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:

mine

my child(ren)'s Regina Ming-Lee

tax records

financial records

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

Department of Children and Family records

Children Requiring Assistance records

sexual assault records

school records

criminal records

police reports

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

SUSAN MING  
Name

May 1, 2021  
Date

COMMONWEALTH OF MASSACHUSETTS  
TRIAL COURT  
PROBATE AND FAMILY COURT DEPARTMENT

Worcester, ss.

Docket No. 20 W 4356

Susan Ming,  
Plaintiff

v.

David Lee,  
Defendant

**Proposed  
Order of Impoundment**

Submitted by Susan Ming  
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:
- |  |   |
|--|---|
| <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.

- |  |  |
|--|--|
| <input type="checkbox"/> Medical and mental health records from any and all sources: | <input type="checkbox"/> Department of Children and Family records |
| <input type="checkbox"/> _____   | <input type="checkbox"/> Children Requiring Assistance records     |
| <input type="checkbox"/> child(ren)'s _____  | <input type="checkbox"/> sexual assault records                    |
| <input type="checkbox"/> tax records   | <input type="checkbox"/> school records                            |
| <input type="checkbox"/> financial records   | <input type="checkbox"/> criminal records                          |
| <input type="checkbox"/> other records _____   | <input type="checkbox"/> 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 Susan Ming**  
**in Support of Motion to Impound**  
**Under Trial Court Impoundment Rules**

1. My name is Susan Ming. I have a 13-year old daughter, Regina Ming-Lee with David Lee.
2. Our daughter Regina suffers from post-traumatic stress disorder due to sexual abuse by a family member when she was very young.
3. Many of the issues in this custody case are related to Regina's emotional health and special needs.
4. The testimony and evidence that will be presented in the case are extremely sensitive in nature. It would be harmful to Regina if any of the information or documents related to this case be available to the public.

Signed under the penalties of perjury,

SUSAN MING

Signature

May 1, 2021

Date

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

**CERTIFICATE OF SERVICE**

I, Susan Ming, hereby certify that on the date May 1, 2021 a copy of the  
Motion to Impound, Proposed Order and Affidavit was served on David Lee.

in-hand  
 by mail at 312 Winding Road, Worcester, MA 01601  
address

May 1, 2021  
Date

SUSAN MING  
Signature

Sample