

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:

- | | |
|--|---|
| <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 | |

Check the boxes next to the information you need the judge to impound.

- 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

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TRIAL COURT
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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.

Medical and mental health records from any and all sources:

- _____
 child(ren)'s Regina Ming-Lee
 tax records
 financial records
 other records _____

- Department of Children and Family records
 Children Requiring Assistance (CRA) 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.

You must tell a judge the reasons you need to keep contact or sensitive information private.

The judge signs and dates this form after a hearing.

Justice of the Probate and Family Court

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

Susan has to show the court that she served David properly. She uses the Certificate of Service.

When you sign the "Certificate of Service" you swear that you mailed or handed the other person a copy of the motion and proposed

**Motion to Impound
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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