

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION

ELIZABETH MARTIN

PLAINTIFF

V.

CIVIL ACTION NO. 3:20-cv-00460-CWR-LGI

PATRICIA MARSHALL

DEFENDANT

PLAINTIFF'S MOTION FOR ORDER SEALING FILE

Plaintiff moves the Court for an Order Sealing the File since the file contains sensitive information about the Plaintiff, and the Defendant, and in support thereof would show unto the Court the following:

1. Plaintiff filed a Complaint against Defendant, Patricia Marshall, on June 9, 2020. The case has been diligently litigated. A number of records and documents have been filed with the Court and exchanged among the parties. Many of the records and documents are sensitive and contained confidential information and other information should not be disclosed and used only in the litigation of this case.
2. Plaintiff has provided a broad range of information and documents, including manipulated photos of herself posted by the Defendant, libelous postings about herself made by the Defendant, private conversations between herself and third parties, and other confidential information.
3. The information and documents provided could be detrimental to the Plaintiff and the Plaintiff's career and reputation. Some of the documents contain false accusations made by the Defendant claiming that the Plaintiff engages in prostitution, as well as other vile and disgusting acts. The Defendant also incorrectly accused the Plaintiff of being a Nazi, and other dangerous moral ideologies. The various postings made by the Defendant about the Plaintiff are

injurious to the Plaintiff's character and legal career, and as such, these documents and the file should be sealed.

4. The Plaintiff requests this Court to enter an order sealing the court file and record during the course of this litigation, and that the documents used and produced in this litigation remain confidential, and that they be used only for purposes of this litigation.

5. In support of her Motion, the Plaintiff relies upon the pleadings and other papers filed in this matter to date.

6. Plaintiff requests a waiver of the requirement for a brief in support of this Motion.

WHEREFORE, PREMISES CONSIDERED Plaintiff moves the Court for an Order sealing the court file and record during the course of this litigation, ordering that the documents used and produced in this litigation remain confidential, and ordering that they be used only for purposes of this litigation.

This the 4th day of November, 2021.

PLAINTIFF

By: /s/ Wayne E. Ferrell, Jr.

WAYNE E. FERRELL, JR.

Wayne E. Ferrell, Jr.
Mississippi Bar No. 5182
Attorney at Law
Law Offices of Wayne E. Ferrell, Jr., PLLC
405 Tombigbee Street
Post Office Box 24448
Jackson, Mississippi 39225-4448
Telephone (601) 969-4700
Fax (601) 969-7514
wferrell@airlawonline.com

CERTIFICATE OF SERVICE

I, WAYNE E. FERRELL, JR., do hereby certify that I have this day electronically filed the foregoing document with the Clerk of the Court utilizing the ECF system which sent notification of such filing to all counsel of record.

This the 4th day of November, 2021.

By: /s/ Wayne E. Ferrell, Jr.
WAYNE E. FERRELL, JR.