

THE STATE OF NEW HAMPSHIRE

GRAFTON, SS

SUPERIOR COURT
DOCKET NO. 215-2022-CV-00014

[REDACTED]
Plaintiff,

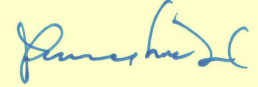
v.

**TOWN OF LISBON, and
NEW HAMPSHIRE DEPARTMENT OF JUSTICE,
Defendants.**

EX PARTE MOTION TO SEAL

215-2022-CV-00014

Granted



Honorable Lawrence A. MacLeod, Jr.
January 21, 2022

Clerk's Notice of Decision
Document Sent to Parties
on 01/24/2022

NOW COMES the Plaintiff, [REDACTED] by and through his counsel, Cooper Cargill Chant, P.A., and hereby moves that this Court seal the docket and all pleadings in this matter, and in support thereof submits as follows:

1. This action is being filed pursuant to RSA 105:13-d, to protect the Plaintiff's State and Federal Constitutional rights, and to remove his name from the so-called Exculpatory Evidence Schedule (also known as the "Laurie List").
2. The Plaintiff is concerned that publicly having his name as plaintiff will undercut any relief obtained in this matter, and will further jeopardize his ability to obtain future employment in the criminal justice and policing field – even if he is fully vindicated in this matter.
3. When determining whether to seal a case, "the burden of proof rests with the party seeking closure...to demonstrate with specificity that there is some overriding consideration or special circumstance, that is, a sufficiently compelling interest, which outweighs the public's right of access to those records." *In re Keene Sentinel*, 136 N.H. 121, 128 (1992) (citation omitted).



True Copy Attest



David P. Carlson, Clerk of Court
February 4, 2022

4. The plaintiffs' interest in having this lawsuit be filed under seal, while his Constitutional rights are vindicated, is a compelling interest that outweighs the right of the public's right of access to this litigation's docket.

The WHEREFORE, the Plaintiff respectfully requests that this Court:

- A. Seal the Docket and all pleadings in this matter, until further order of this Court; and
B. Grant such further relief as is just and equitable.

Respectfully submitted,

PLAINTIFF,

████████████████████,

By His Attorneys,

COOPER CARGILL CHANT, P.A.

/s/ Christopher T. Meier

Dated: September 2, 2021

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True Copy Attest

A handwritten signature in blue ink, appearing to read "D. Carlson", is written over the printed name.

David P. Carlson, Clerk of Court

February 4, 2022