

IN THE MISSOURI COURT OF APPEALS
EASTERN DISTRICT

ARCHDIOCESE OF ST. LOUIS, <i>et al.</i> ,)	
)	
Relators,)	Case No.
)	
vs.)	
)	
HONORABLE ROBERT H. DIERKER,)	
JUDGE, CIRCUIT COURT FOR THE CITY)	
OF ST. LOUIS,)	
)	<u>FILED UNDER SEAL</u>
Respondent.)	

MOTION OF RELATORS TO FILE UNDER SEAL

COME NOW Relators Archdiocese of St. Louis and Archbishop Robert J. Carlson, and for their Motion to File Under Seal state as follows:

1. Relators' filed herewith their Petition for Writ of Prohibition which includes and discusses information which was designated by Relators as "Confidential" pursuant to the Protective Order entered by Honorable Robert H. Dierker, Respondent, on November 15, 2013. A copy of the Protective Order is attached to this Motion as Exhibit 17.

2. The "Confidential" information included in Relators' Petition for Writ of Prohibition includes information about third-parties that would violate their privacy rights and would be detrimental to their emotional well-being and their societal reputations. In fact, the Plaintiff in the underlying case is proceeding under the pseudonym Jane Doe.

WHEREFORE, in light of the confidential nature of the documents relied upon in the Relators' Petition for Writ of Prohibition and the Circuit Court's Protective Order in

the underlying case, the Archdiocese and Archbishop Robert J. Carlson respectfully request an Order directing the Clerk's Office to put under seal their Petition for Writ of Prohibition and all relevant documents, and for such other and further relief as the Court deems appropriate.

Respectfully submitted,

CARMODY MacDONALD P.C.

By: /s/ Gerard T. Carmody
Gerard T. Carmody, #24769
David P. Stoeberl, #46024
Ryann C. Carmody, #56831
120 South Central Avenue, Suite 1800
St. Louis, Missouri 63105
Telephone (314) 854-8600
Facsimile (314) 854-8660
gtc@carmodymacdonald.com
dps@carmodymacdonald.com
rcc@carmodymacdonald.com

and

LEWIS ROCA ROTHGERBER LLP
L. Martin Nussbaum (pro hac pending)
Scott M. Browning (pro hac pending)
William Voit (pro hac pending)
Telephone (719) 386-3000
Facsimile (719) 386-3070
mnussbaum@lrrlaw.com
sbrowning@lrrlaw.com
wvoit@lrrlaw.com

Attorneys for Relators Archdiocese and
Archbishop Robert J. Carlson