

COMMONWEALTH OF MASSACHUSETTS
TRIAL COURT
PROBATE AND FAMILY COURT DEPARTMENT

Hampden, ss

Docket No. 20 P 1234

Rosa Perez,

Plaintiff

v.

Motion to Impound
Under the Trial Court
Impoundment Rules

Jennifer Ramos,

Defendant

Now comes, Jennifer Ramos, 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:

- | | |
|---|--|
| <input checked="" type="checkbox"/> Medical and mental health records from any and all sources: | <input type="checkbox"/> Department of Children and Family records |
| <input checked="" type="checkbox"/> mine | <input type="checkbox"/> Children Requiring Assistance records |
| <input type="checkbox"/> my 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 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

Jennifer Ramos

Jennifer's proposed order shows the judge the information she needs the judge to order be impounded.

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Docket No. 20 P 1234

Rosa Perez,

Plaintiff

v.

Proposed
Order of Impoundment

Jennifer Ramos,

Defendant

Submitted by Jennifer Ramos
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:
 - 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 _____
- 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:
 - Jennifer Ramos
 - child(ren)'s _____
 - tax records
 - financial records
 - other records _____
 - Department of Children and Family records
 - Children Requiring Assistance 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.

Affidavit of Jennifer Ramos

Justice of the Probate and Family Court

**in Support of Motion to Impound
Under Trial Court Impoundment Rules**

1. My name is Jennifer Ramos. My son, Malcolm is 10 years old.
2. On February 2, 2021 my mother filed for guardianship of Malcolm.
3. In the Complaint my mother told the court that my mental health issues prevent me from being able to properly take care of my son.
4. My mental health issues do not get in the way from me taking care of Malcolm.
5. In support of my case against the guardianship I plan to submit my medical records which include sensitive information about my personal life and health history. It would be harmful to me and Malcolm if these sensitive documents were available for review by members of the public that are not involved in the case.

Signed under the penalties of perjury,

May 1, 2021
Date

Jennifer Ramos

Signature

Jennifer has to show the court that she served Rosa 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
Under Trial Court Impoundment Rules**

CERTIFICATE OF SERVICE

I, Jennifer Ramos, hereby certify that on the date May 1, 2021

a copy of the Motion to Impound, Proposed Order and Affidavit was served on

Rosa Perez

in-hand

by mail at 432 Highland Ave, Springfield, MA 01109
address

May 1, 2021
Date

Jennifer Ramos

Signature

SAMPLE