

DOCKET NO. LLI-CV21-5014019-S

SUPERIOR COURT

JON A. GOODWIN

JUDICIAL DISTRICT

OF LITCHFIELD

V.

AT TORRINGTON

RAYMOND J. MILOT, ET AL.

JANUARY 3, 2021

MOTION TO FILE DOCUMENTS UNDER SEAL

Pursuant to Practice Book Sections 7-4B, 7-4C, and 11-20A, defendant Robert Khalil, MD, respectfully moves for permission to file under seal, a Special Motion to Dismiss, Memorandum of Law in Support of Special Motion to Dismiss and the exhibit attached thereto. A Memorandum of Law in Support hereof is attached.

DEFENDANT,
ROBERT KHALIL, MD

By: /s/ Vimala B. Ruszkowski
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CERTIFICATION

I hereby certify that a copy of the foregoing document was or will immediately be mailed or delivered electronically or non-electronically on this the 3rd day of January, 2022 to all attorneys and self-represented parties of record and that written consent for electronic delivery was received from all attorneys and self represented parties of record who receive or will immediately be receiving electronic delivery.

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_____/s/
Vimala B. Ruszkowski
Commissioner of the Superior Court

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**MEMORANDUM OF LAW IN SUPPORT OF MOTION TO FILE DOCUMENTS
UNDER SEAL**

Pursuant to Practice book sections 7-4B, 7-4C, and 11-20A, defendant, Robert Khalil, MD, files the Memorandum of Law in Support of his Motion to File Documents Under Seal.

This case involves Dr. Khalil's decision, as a mandated reporter, to make a report to the Department of Children and Families. The documents defendant wishes to file under seal are the defendant's Special Motion to Dismiss, Memorandum of Law in Support of Special Motion to Dismiss and associated exhibit.

Defendant's filings require defendant to provide the Court with the information that prompted his decision to involve DCF, which includes sensitive health information. Without an authorization, such information is protected from disclosure by The Health Insurance Portability and Accountability Act (HIPAA).

Defendant respectfully submits that filing under seal is necessary to preserve the privacy interests of those involved, and to protect the defendant from unauthorized disclosure of protected health information, both of which override the public's interest in viewing said materials.

Wherefore, the defendant respectfully asks the Court to grant his Motion to File Documents Under Seal.

DEFENDANT,
ROBERT KHALIL, MD

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