

IN THE COUNTY/CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT
IN AND FOR PINELLAS COUNTY, FLORIDA

CHRISTOPHER GLEASON
Plaintiff,

v.
JULIE MARCUS
Defendant.

Case #: 24-003995-CI

MOTION TO DETERMINE THE CONFIDENTIALITY OF TRIAL COURT RECORDS

The undersigned, by and through his/her attorney, moves the Court pursuant to Florida Rule of Judicial Administration 2.420 for an order determining the confidentiality of court records.

a. The undersigned's attorney has given written notice of the subject motion to all affected non-parties N/A, and filed copies of the notice provided. The notice identified this case by docket number; described the confidential information with as much specificity as possible without revealing the confidential information, including the "precise location" of the information in the file/record; and advised that if the motion is denied by the court then the subject material will not be treated as confidential by the Clerk.

b. The particular court records or portion of a record that the movant seeks to have determined as confidential are: _____

Docket entry #18 pages 2 and 4 of 27 filed 09/09/2024 as exhibit G Configuration Report

c. The movant seeks an order sealing the following information relative to this case: *[select all that apply]*

- the party's name on the progress docket.
- particular documents within the court file, specifically Docket entry #18 pages 2 and 4 of 27 filed 09/09/2024 as exhibit G Configuration Report
- the entire court file, but not the progress docket.
- the entire court file and the progress docket.

d. The legal basis for determining the court records to be confidential is: _____
Florida Rule of Judicial Administration 2.420, Florida Statutes 119.0725 (2)(b), 119.0725 (2)(d)

e. The specific legal authority and applicable legal standards for determining such court records to be confidential are: Florida Statutes 119.0725 (2)(b), 119.0725 (2)(d). See Exhibit A, Exhibit B and Exhibit C.

f. *[For rule 2.420(c)(9) motions]* Confidentiality of _____
Confidential and Sensitive Information is required to
protect the following interest(s): *[select any/all that apply]*

- 1. Preventing a serious and imminent threat to the fair, impartial, and orderly administration of justice, specifically: _____
- 2. A trade secret.
- 3. A compelling government interest, specifically: Protection of Designated Election Critical Infrastructure
- 4. Obtaining evidence to determine the legal issues in a case;
- 5. Avoiding substantial injury to innocent third parties, specifically: _____

6. Avoiding substantial injury to a party by the disclosure of matters protected by a common law or privacy right not generally inherent in this type of proceeding, specifically: Designated Election Critical Infrastructure

7. Complying with established public policy set forth in the Florida or United States Constitution or statutes or Florida rules or case law, specifically: _____

See Exhibit A, Exhibit B and Exhibit C. Florida Rule of Judicial Administration 2.420, Florida Statutes 119.0725 (2)(b), 119.0725 (2)(d).

g. There is no less restrictive measure available to protect this/these interest(s), and the degree, duration and manner of confidentiality ordered herein are no broader than necessary to protect the interest(s).

Wherefore, the undersigned REQUESTS that:

The Court set this motion for a hearing.

The Court finds that the identified documents are confidential and for the Court to seal the following materials related to this matter and to keep such materials from public access: *[select all that apply]*

1. The party's name on the progress docket and in the case style. On the public progress docket, the Clerk of the Circuit Court shall substitute the following for the party's name: _____ . Further, the Clerk shall ensure that the party's name is redacted from all public materials in the file and that the final judgment is recorded in a manner that does not reveal the identity of the party. However, the progress docket and the file shall otherwise remain available to the public.

2. The following documents within the court file: _____
Docket entry #18 pages 2 and 4 of 27 filed 09/09/2024 as Exhibit G Configuration Report
However, the file and progress docket shall otherwise remain available to the public subject to any substitution of a party's name set forth above.

3. The entire court file. However, the progress docket shall remain open to the public subject to any substitution of a party's name set forth above.

4. The entire court file and the progress docket. The progress docket shall not be available on any public information system. However, the case number shall remain public.

I certify that this motion is made in good faith and is supported by a sound factual and legal basis.

Submitted and filed on 09/13/2024

I hereby certify that a copy of the foregoing was furnished by e-mail/U.S. Mail/personal service on 09/13/2024 to: gleasonforpinellas@gmail.com, cpgleason72@gmail.com and immutabletruth@protonmail.com

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