

Pursuant to Pa.R.Civ.P. 401(c), I certify this to be a true copy of the document filed with the Court.

*Kimberly M. Colonna*  
Kimberly M. Colonna

McNees Wallace & Nurick LLC  
Kimberly M. Colonna (PA 80362)  
717-237-5278  
Kathleen Duffy Bruder (PA 74425)  
717-237-5318  
100 Pine Street  
P.O. Box 1166  
Harrisburg, PA 17108-1166

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DEBRA D. JENSEL  
PROthonotary  
CENTRE COUNTY, PA  
FILED BY

IN THE COURT OF COMMON PLEAS  
OF CENTRE COUNTY, PENNSYLVANIA

JONATHAN D. GRINE  
Plaintiff

v.

:  
:  
:  
: NO. 2015-1080  
:  
:  
:

COUNTY OF CENTRE, THE McSHANE :  
FIRM, LLC, and THEODORE C. TANSKI, :  
Defendants :

**PLAINTIFF'S MOTION TO SEAL**

Plaintiff Jonathan D. Grine ("Judge Grine"), by and through his attorneys, McNees Wallace & Nurick LLC, hereby moves the Court to seal the Complaint, Plaintiff's Petition for Emergency Injunction and Preliminary Injunction, and any other pleadings (including those of Defendant) and documents accompanying the same relating thereto. In support of this Motion to Seal (the "Motion"), Plaintiff avers as follows:

1. Court filings may be sealed if doing so serves an important interest and there is no less restrictive way to achieve it.

2. Courts have typically found good cause to exist where sealing the record protects, *inter alia*, trade secrets and/or the privacy and reputations of innocent parties. See In Re Estate of duPont, 966 A.2d 636, 638 (Pa. Super. 2009).
3. The decision to seal the record rests within the sound discretion of the trial court. See Zdrok v. Zdrok, 829 A.2d 697, 700 (Pa. Super. 2003).
4. Here, the above-captioned matter arises out of the improper disclosure of private information about Plaintiff and the violation of Plaintiff's constitutional right of privacy.
5. By filing this action, Plaintiff seeks to prevent the further disclosure of his private information and the further violation of his right of privacy.
6. Thus, the very nature of this action concerns statements and information which, if made public, would be detrimental to Plaintiff's reputation and privacy rights.
7. Filing other than under seal would effectively undermine the important interests that Plaintiff seeks to protect by filing the action.
8. Plaintiff therefore submits and requests that its Complaint, Petition for Emergency Injunction and Preliminary Injunction, and related documents be filed under seal pending further order of the Court.
9. Without the Court granting this Motion, Plaintiff fears that the very irreparable harm that she seeks to avoid in commencing this suit will result from litigation publicity.

WHEREFORE, Plaintiff Jonathan D. Grine requests that the Court place under seal Plaintiff's Complaint, Plaintiff's Petition for Emergency Injunction and Preliminary Injunction, and all related filings.

McNEES WALLACE & NURICK LLC

By 

Kimberly M. Colonna (PA 80362)  
Kathleen Duffy Bruder (PA 74425)  
100 Pine Street, P.O. Box 1166  
Harrisburg, PA 17108-1166  
Ph. 717-232-8000  
*Attorneys for Jonathan D. Grine*

Dated: March 16, 2015