

**IN THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MISSOURI  
CENTRAL DIVISION**

COMPREHENSIVE HEALTH OF )  
PLANNED PARENTHOOD )  
GREAT PLAINS, et al. )  
 )  
Plaintiffs, )  
 )  
v. )  
 )  
DR. RANDALL WILLIAMS, et al., )  
 )  
Defendants. )

Case No. 2:16-cv-04313-HFS

**MOTION FOR LEAVE TO FILE MEDICAL RECORDS UNDER SEAL**

Defendants Hawley and Williams (“State Defendants”) move for leave to file under seal Exhibits 5, 6, and 7 to the State Defendants’ Post-Hearing Supplemental Brief in Opposition to Plaintiffs’ Motion for Preliminary Injunction. Two of these exhibits contain personal medical records, and one consists of documents relating to Plaintiff RHS’s emergency-response protocols that Plaintiffs have designated “Confidential” under the Stipulated Protective Order.

In support of this motion for leave, the State Defendants state that Exhibits 5 and 6 contain medical records related to complications experienced by patients of Plaintiff Reproductive Health Services of Planned Parenthood of the St. Louis Region (“RHS”). Specifically Exhibit 5 contains ambulance and medical records from Abbott Ambulance, Inc. and Exhibit 6 contains ambulance and medical records from the St. Louis City Fire Department. Records in both exhibits have been designated “Confidential” under the Stipulated Protective Order entered in this case (Doc. 71).

Additionally, the State Defendants seek leave to seal documents produced by Plaintiff RHS and marked confidential under the Stipulated Protective Order (Doc. 71). Exhibit 7 contains generalized procedures or protocols of RHS for calling for emergency medical services

on behalf of patients. To be clear, the State Defendants do not concede that this particular Exhibit, which contains generalized information regarding RHS procedures for contacting emergency services, contains any private or personal information that warrants a designation of “Confidential” under the Stipulated Protective Order, but they seek leave to file it under seal because Plaintiffs have designated it “Confidential.”

WHEREFORE, for the reasons herein stated, State Defendants respectfully request that this Court grant them leave to file certain supplemental post-hearing preliminary injunction exhibits under seal at this time.

Respectfully submitted,

**JOSHUA D. HAWLEY**  
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**CERTIFICATE OF SERVICE**

I hereby certify that on the 31st day of March, 2017, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which sent notification to the following:

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