

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

S.C.,)	
)	
Plaintiff,)	
)	
vs.)	Case No. 4:11-cv-392
)	
DIRTY WORLD, LLC,)	
)	
And)	
)	
NIK RICHIE AKA "HOOMAN KARAMIAN")	
)	
Via Registered Agent)	
Corporate Creations Network, Inc.)	
3411 Silverside Road)	
Rodney Building #104)	
Wilmington, DE 19810)	
)	
)	
Defendants.)	
)	

MOTION TO SEAL CASE

COMES NOW, S.C., by and through undersigned counsel, and moves this court for an entry of an Order pursuant to Federal Rule of Civil Procedure 5.2 sealing this case and all past and future pleadings and exhibits. In support thereof the Plaintiff states as follows:

1. Plaintiff filed a complaint against Defendants alleging defamation, false light invasion of privacy, intentional infliction of emotional distress, and publication of private facts with this Court on April 14, 2011. Service has yet to be perfected.
2. Plaintiff filed under her initials as she wished not to use her name to the nature of the suit and possibility of further publicity of the facts of the case and risk of notoriety.
3. The causes of action arose out of information published by the Defendants on "www.thedirty.com," a public website owned and operated by Defendants.

4. The information posted was defamatory and salacious in nature and has caused damage to Plaintiff's reputation and standing in the community.
5. The facts of the case and information that will be contained in future pleadings and exhibits are personal, private, and sensitive in nature. The statements published by Defendants are false and keeping them a matter of public record would only serve to further harm Plaintiff and invade her privacy.
6. Placing this case and all past and future pleadings under seal would not prejudice Defendants and making the facts of the case a public record would not serve any reasonable public interest.
7. Redaction of documents is not adequate to protect the privacy and interests of Plaintiff in this case.
8. The reasons for Plaintiff's motion are more fully set forth in the Suggestions in Support of Motion to Seal Case contemporaneously filed with this motion.

WHEREFORE, Plaintiff respectfully requests pursuant to Federal Rule of Civil Procedure 5.2 that this Court enter an Order to place this case and all past and future filings under seal and for other or further relief that this Court deems just. For convenience of the Court, Plaintiff has provided a Proposed Order to Seal Case with this motion.

Respectfully submitted,
THE O'CONNOR LAW FIRM, P.C.

By: /s/ Matthew J. O'Connor
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ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

I hereby certify that on 4/25/11 I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system and I hereby certify that I have mailed and served via certified mail, return receipt requested the document to the following non CM/ECF participants:

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Dirty World, LLC
Via registered agent:
Corporate Creations Network, Inc.
3411 Silverside Road
Rodney Building #104
Wilmington, DE 19810

And

upon information and belief, Defendant Dirty World's and Defendant Richie's Attorney
David Gingras
Gingras Law Office, PLLC
3941 E. Chandler Blvd., #106-243
Phoenix, AZ 85048

And

Nik Richie aka Hooman Karamian
7137 E. Rancho Vista Dr.
Unit 4007
Scottsdale, AZ 85251

/s/ Matthew J. O'Connor
Matthew J. O'Connor