

**IN THE
CIRCUIT COURT OF ST. LOUIS, MISSOURI
22nd JUDICIAL CIRCUIT**

<p>REPRODUCTIVE HEALTH SERVICES OF PLANNED PARENTHOOD OF THE ST. LOUIS REGION</p> <p>Petitioner,</p> <p>v.</p> <p>MICHAEL L. PARSON, <i>et al.</i></p> <p>Respondents.</p>	<p>Case No. 1922-CC02395</p> <p>Division No. 6</p>
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MOTION TO FILE SEALED DOCUMENT

COMES NOW Petitioner, by counsel, and moves this Court for permission to file under seal its June 18, 2019 plan of corrections in response to Respondents’ statement of deficiencies, previously filed with this Court as Exhibit A to Defendants’ Motion to Reconsider or Amend the Court’s Order Granting a Preliminary Injunction and Notice of Compliance (“Defendants’ Mot. to Reconsider”).

1. As noted previously by Petitioner, HIPAA-covered entities are not permitted to release patient protected health information (“PHI”), which includes dates of admissions to medical facilities and any other information “which could be used, alone or in combination with other reasonably available information . . . to identify an individual who is a subject of the information.” 45 C.F.R. §§ 164.514(b)(1), (2); Petitioner’s Motion to Seal Court Records Containing Confidential Health Information at 1.

2. Respondents agree that Petitioner is a covered entity under HIPAA. *See* Defendants' Motion to Unseal Statement of Deficiencies at 5.

3. Respondents filed a statement of alleged deficiencies with this Court on June 13, 2019, as Exhibit A to Defendants' Motion to Reconsider or Amend the Court's Order Granting a Preliminary Injunction and Notice of Compliance.

4. On June 18, 2019, Petitioner submitted to Respondents a responsive plan of correction. Petitioner's Certificate of Service of Plan of Correction June 19, 2019.

5. Because the plan of correction contains information which, alone or taken together with other reasonably available information, could be used to identify one or more patients, Petitioner respectfully requests that it be permitted to file the plan of correction under seal.

Dated: June 19, 2019

Respectfully submitted,

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** Pro hac vice motion pending*