

VIRGINIA

IN THE CIRCUIT COURT FOR FAIRFAX COUNTY

FILED
CIVIL DIVISION
99 06 29 11:08:00
CLERK OF CIRCUIT COURT
FAIRFAX, VA

KAREN SANTORUM)
1101 LANDESET DRIVE)
HERNDON, VA 20170)

Plaintiff,)

vs.)

At Law No.: 175800

DAVID B. DOLBERG, D.C.)
c/o FAMILY CHIROPRACTIC)
CENTERS, P.C.)
8996 BURKE LAKE ROAD, SUITE 104)
BURKE, VA 22015)

and)

FAMILY CHIROPRACTIC CENTERS, P.C.)
8996 BURKE LAKE ROAD, SUITE 104)
BURKE, VA 22015)

MOTION TO PLACE ACTION UNDER SEAL

Karen Santorum, through her counsel, Richard Holzheimer and Amy S. Owen, Miles & Stockbridge, hereby move as follows:

PARTIES

1. The Plaintiff, Karen Santorum (hereinafter "Plaintiff") has filed this action for her personal injuries sustained as a result of the defendants' actions.
2. The Plaintiff and her husband, United States Senator Santorum, are public figures.
3. This action contains personal information about the Plaintiff, including but not

limited to medical information involving her pregnancies and her emotional state.


4. Plaintiff requests that this action be placed under seal to protect both her and her husband's privacy.

5. Plaintiff's request is without prejudice to defendants moving to remove the seal if circumstances warrant such removal.

WHEREFORE, Plaintiff Karen Santorum requests that the Court place this action under seal.

Karen Santorum
Plaintiff
By Counsel

MILES & STOCKBRIDGE P.C.

By: 
Amy S. Owen (VSB #27692)
Richard D. Holzheimer (VSB #40803)
1741 Pinnacle Drive, Suite 500
McLean, Virginia 22102-3833
(703) 903-9000

Heather S. Heidelbaugh, Esquire
BURNS WHITE & HICKTON
2400 Fifth Avenue Place
120 Fifth Avenue
Pittsburgh, PA 15222-3001
(412) 394-2582

Counsel for Plaintiff