**STATE’S MOTION FOR PROTECTIVE ORDER SEALING DISCOVERY**

**State of Florida**

COMES NOW the State Attorney for the Eleventh Judicial Circuit of Florida, by and through the undersigned Assistant State Attorney, and hereby moves this Honorable Court to issue an order requiring the masking, deletion or excision of any and all information which would permit the identification of the child-victim in this cause, and, as grounds therefore, would aver the following:

1. The defendant in the above-styled cause is charged with \_\_\_\_\_\_\_ count(s) of \_\_\_\_\_\_\_, in violation of Florida Statute \_\_\_\_\_\_\_.
2. Pursuant to the State’s obligation under Florida Rule of Criminal Procedure 3.220, the State will be filing in Court, and providing the defendant with discovery including but not limited to, reports and statements of various witnesses.
3. The aforesaid victim is \_\_\_\_\_\_ years old and, should this discovery become available for inspection by the public and/or press at any time, this victim and her family would suffer irreparable harm.
4. The age of this victim constitutes a compelling reason for this Court to exercise its inherent power to control the conduct of its own proceedings.
5. Furthermore, some of the information contained in these discovery materials is privileged under Florida Statute 119.07(h).

THEREFORE, the State of Florida prays that this Honorable Court enter an order pursuant to Florida Statute 119.07(4) and its inherent power, ordering the masking, deletion or excision of any and all information, which would permit the identification of the child-victim in this cause.

Date:

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Assistant State Attorney