

IN THE CIRCUIT COURT OF INDEPENDENCE COUNTY, ARKANSAS

LUNDEN ALEXIS ROBERTS

PLAINTIFF

vs.

ROBERT HUNTER BIDEN

DEFENDANT

Case No: 32DR-19-187
2D DIV.

MOTION TO SEAL WITH INCORPORATED BRIEF

COMES NOW the plaintiff, by and through her attorneys, **LANCASTER & LANCASTER LAW FIRM, PLLC**, and for her motion states:

1. That DNA testing has established with scientific certainty that the defendant is the father of the plaintiff's child.
2. That the defendant is not expected to challenge the results of the DNA test or the testing process.
3. That it is anticipated that this Court will enter an order of paternity finding the defendant to be the natural and legal father of the child who has, to date, only been identified in pleadings to the Court as Baby Doe.
4. That a paternity order will identify Baby Doe by the child's full name and date of birth.
5. That Baby Doe's paternal grandfather, Joe Biden, is seeking the nomination of the Democratic Party for President of the United States of America (he has already filed for the March 2020 Arkansas primary). He is considered by some to

be the person most likely to win his party's nomination and challenge President Trump on the ballot in 2020.

6. That members of the Biden family either are protected or eligible to be protected by the United States Secret Service as a direct result of Joe Biden's political status.

7. That Baby Doe's paternity could put the child and those close to the child at risk of harm for the same reasons the Biden family is protected by the United States Secret Service.

8. That this Court should protect the public's access to court records. *See* Ark. Sup. Ct. Admin. Order No. 19 § 1(B)(1)(2)(3)(8)(11) (listing factors in support of the public's access to court records). *See also id.* at § 4(A)(B)(C) ("public access shall be granted to court records" and outlining redaction procedures).

9. That this Court should also take steps to protect Baby Doe. *See id.* at § 7(A)(3) (information that is excluded from public access by order or rule of the court is confidential and may not be obtained absent a court order to the contrary).

10. That this Court should seal the full name and date of birth of Baby Doe as well as all other identifying information about Baby Doe that either is or may become part of the record in this case. Pleading further, this is the least restrictive action that will both protect the public's access to court records while also providing protection for Baby Doe, the child's family, and those who interact with and love Baby Doe.

11. That this Court should order its Clerk to remove or otherwise withhold all information about Baby Doe's name, initials, gender, date of birth (full or partial), and other identifying information about the child from publicly accessible records—online or otherwise.

12. That this Court should order that the only persons other than the Court, its Clerk, and their staff who may obtain unredacted copies of orders or pleadings containing identifying information about Baby Doe are the parties themselves, their attorneys of record, or any other person who fully complies with Ark. Sup. Ct. Admin. Order 19 § 8.

WHEREFORE the plaintiff moves this honorable Court for an order to partially seal information about the child in this case; for attorney's fees and costs; and for all other just and proper relief to which she might be entitled.

Respectfully Submitted,

**LANCASTER & LANCASTER
LAW FIRM, PLLC**

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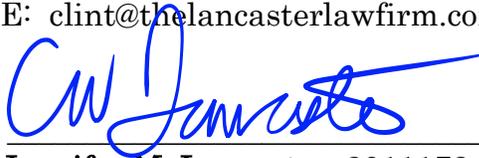
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CERTIFICATE OF SERVICE

I certify that a copy of the foregoing has been delivered by the below method to the following person or persons:

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on this 20 DAY of NOVEMBER, 2019.



Clinton W. Lancaster