

**IN THE SUPERIOR COURT OF FULTON COUNTY
STATE OF GEORGIA
Family Law Division**

O.N.W.,)
)
PETITIONER,)
)
vs.) **CIVIL ACTION FILE NUMBER:**
) **2022CV361130**
R.G.W,)
)
RESPONDENT.)

**JOINT MOTION TO FILE AND SEAL ALL PAST PLEADINGS
AND FUTURE PLEADINGS & MOTION FOR CLOSED HEARINGS**

Comes now, petitioner, O.N.W., through her counsel of record and respondent, R.G.W, through his counsel of record and file their motion to seal past and future pleadings pursuant to U.S.C.R. 21 and show that there is an overriding interest that is likely to prejudice the parties and their minor children if hearings relating to modification of custody is not closed. The parties show the court the following:

1.

The parties show that the Respondent is a public figure serving in a political office. Respondent is currently running for reelection for said political office.

2.

The parties show that their prior divorce action including the final judgment and decree under the civil action R.G.W. v. O.N.W.; Fulton Superior Court, Civil Action no.: 2019-CV321653 was *sealed* by this honorable court.

3.

The parties show that Respondent's opposition is utilizing the public records in order to gain some political advantage or gain, but more importantly said pleadings can harm the

E. N. Banks-Ware
Law Firm, LLC

Ware's Professional Bldg.
3636 Panola Road, Suite A
Lithonia, Georgia 30038
770-593-9849 office
770-593-9851 fax
E-Mail Noreen@nbwlaw.net

parties' children who are by nature targets of Respondent's opposition. The minor children could possibly be harmed by the opposition or any unstable person that sympathizes with them.

4.

All court records are public and are to be available for public inspection unless public access is limited by law or by the procedure set forth below.

[Ga. Unif. Super. Ct. 21](#)

5.

Petitioner and Respondent are jointly filing under this provision to move the court to allow the past pleadings to be sealed and allow any future pleadings to be filed under seal for the protection of them as parties, but more importantly for the protection of their minor children who are the subject of this pending action.

6.

Petitioner and Respondent move the court to close all hearings in this action. For the reasons set forth in paragraph two and three, the parties show that the overriding interest is their children's welfare and privacy which is likely to be prejudiced or if proceedings relating to their custody, personal details of their lives and any information regarding their best interest are publicly heard.

7.

Based on the above, Petitioner and Respondent move for the relief requested herein.

WHEREFORE Petitioner and Respondent pray:

a. That the court considers these motions.

E. N. Banks-Ware
Law Firm, LLC

Ware's Professional Bldg.
3636 Panoia Road, Suite A
Lithonia, Georgia 30038
770-593-9849 office
770-593-9851 fax
E-Mail Noreen@nbwlaw.net

