

1 5. Petitioner engages the services of a full-time security service both at her
2 residence and when she travels with the minor children. Petitioner also tries to keep the
3 minor children's travel and transportation plans as confidential as possible in order to
4 minimize the chances that unscrupulous journalists will gain unwelcome access to Petitioner
5 and the minor children.

6 6. The information contained in the Second Further Judgment on Reserved
7 Issues relating to the minor children's specific timeshare schedule, transportation and other
8 matters could give the media and members of the public at large a greater ability to ascertain
9 the physical whereabouts of the minor children. Such information greatly increases the
10 chances that the actions of the media could threaten the safety of the minor children by, for
11 example, causing a traffic accident or by exposing the minor children to criminals who
12 might target the minor children for financial gain.

13 7. Petitioner and Respondent recently concluded settlement negotiations
14 resolving all of the issues relating to their marital dissolution litigation. The parties'
15 agreement has been incorporated into three separate documents: (a) a Judgment of
16 Dissolution of Marriage, (b) a Further Judgment of Dissolution of Marriage, and (c) a
17 Second Further Judgment on Reserved Issues.

18 8. The parties agree that it is in their and their minor children's best interests to
19 have the agreement reached between them relating to child custody and child support
20 entered as formal orders separate and apart from the other issues in their dissolution of
21 marriage to try to protect their minor children. In order to conclude the litigation between
22 them as promptly as possible, the parties have agreed to segregate the child custody and
23 child support provisions of their agreement into a separate pleading, i.e., the Second Further
24 Judgment on Reserved Issues, which they want the Court to enter on the condition that it is
25 filed by the Court under seal pursuant to California Rule of Court 2.550 to protect their
26 minor children.

27 9. The Second Further Judgment on Reserved Issues contains the terms of legal
28 and physical custody, including the timeshare schedule for the minor children, specifying the

1 weekly/monthly schedule during which Petitioner and Respondent, respectively, will have
2 custody of the minor children. The Second Further Judgment on Reserved Issues also
3 contains additional information relating to transportation and other custodial issues which
4 would make it easy to identify the physical whereabouts of the minor children.

5 10. The Second Further Judgment on Reserved Issues also contains the agreement
6 between the parties as to child support and other highly personal, confidential information.

7 11. Petitioner has lodged the Second Further Judgment on Reserved Issues with
8 the Court under seal pursuant to the provisions of California Rule of Court 2.551 (d).
9 Petitioner requests that the Court grant her request to order the court record sealed.

10 I declare under penalty of perjury under the laws of the State of California that the
11 foregoing is true and correct.

12 Executed on this 26 day of July, 2007, at Los Angeles, California.

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17 LAURA A. WASSER, Declarant
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