

NC-200

<p>ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, state bar number, and address): STATE BAR NO: 212,325                  NAME: John L. Krieger                  FIRM NAME: Dickinson Wright LLP                  STREET ADDRESS: [REDACTED]                  CITY: Las Vegas STATE: NV ZIP CODE: 89113                  TELEPHONE NO: [REDACTED] FAX NO: 702-382-1001                  E-MAIL ADDRESS: [REDACTED]</p>	<p style="text-align: center;"><b>FILED</b>                  Superior Court of California                  County of Los Angeles</p> <p style="text-align: center;">SEP 15 2015</p> <p>Sherril B. Carter, Executive Officer/Clerk                  By <u>[Signature]</u> Deputy                  Doretta Smith</p>
<p>ATTORNEY FOR (Name): William Bruce Jenner                  SUPERIOR COURT OF CALIFORNIA, COUNTY OF Los Angeles                  STREET ADDRESS: 1725 Main Street                  MAILING ADDRESS: 1725 Main Street                  CITY AND ZIP CODE: Santa Monica, 90401                  BRANCH NAME: Santa Monica Courthouse</p>	
<p>PETITION OF (Name):                  William Bruce Jenner</p>	<p>CASE NUMBER:                  SS025720</p>
<p><b>PETITION FOR CHANGE OF NAME AND GENDER</b></p>	

Before you complete this petition, you should read the instructions for Filing a Petition for Change of Name and Gender on the next page. You must answer all questions and check all boxes that apply to you on this petition. You must file this petition in the superior court of the county where the person whose name is to be changed resides.

1. Petitioner (present name): William Bruce Jenner is a resident of this county.
2. Petitioner requests that the court decree that petitioner's name is changed to (proposed name): Caitlyn Marie Jenner
3. Petitioner requests a decree that the petitioner's gender is changed:
  - a.  from male to female.
  - b.  from female to male.
4. An affidavit or a declaration of a physician documenting the gender change through clinically appropriate treatment as provided under Health and Safety Code sections 103425 and 103430 is attached to this petition. (Declaration of Physician (form NC-210) may be used for this purpose.)
5. Petitioner requests that the court order that a new birth certificate be issued reflecting the gender and name changes sought by this petition.
6. Petitioner requests that the court issue an order directing all interested persons to appear and show cause why the petition for change of name should not be granted.
7. Petitioner provides the following information in support of this petition:
  - a. The information contained in the physician's affidavit or declaration.
  - b-f. The information contained in the attachment (attach a completed copy of the attachment Name and Information About the Person Whose Name Is to Be Changed (form NC-110)).

(Instructions on next page)

Page 1 of 2

NC-110

PETITION OF (Name of petitioner or petitioners): <u>William Bruce Jenner</u>	CASE NUMBER: <b>SS025720</b>
FOR CHANGE OF NAME	

**NAME AND INFORMATION ABOUT THE PERSON  
WHOSE NAME IS TO BE CHANGED**

Attachment of

Attachment to Petition (form NC-100 or form NC-200)

(You must use a separate attachment for each person whose name is to be changed. If petitioner is a guardian of a minor, a supplemental attachment, Declaration of Guardian (form NC-110G), must also be completed and attached for each minor whose name is to be changed.)

7. (Continued) Petitioner applies for a decree to change the name of the following person:

b.  Self  Other

(1) Present name (specify): William Bruce Jenner

(2) Proposed name (specify): Caitlyn Marie Jenner

(3) Born on (date of birth): [REDACTED]  
and presently  under 18 years of age  over 18 years of age

(4) Born at (place of birth): [REDACTED]

(5) Sex (as stated on original birth certificate):  Male  Female

(6) Current residence address (street, city, county, and zip code): [REDACTED]

c. Reason for name change (explain): To better match my identity

d. Relationship of the petitioner to the person whose name will be changed:

(1)  self (4)  near relative (indicate relationship):

(2)  parent (5)  Other (specify):

(3)  guardian


e. If the person whose name will be changed is under 18 years of age, provide the names and addresses, if known, of the following persons:

(1) Father (name): \_\_\_\_\_ (address): \_\_\_\_\_

(2) Mother (name): \_\_\_\_\_ (address): \_\_\_\_\_

(3) (Only if neither parent is living) Near relatives (names, relationships, and addresses):

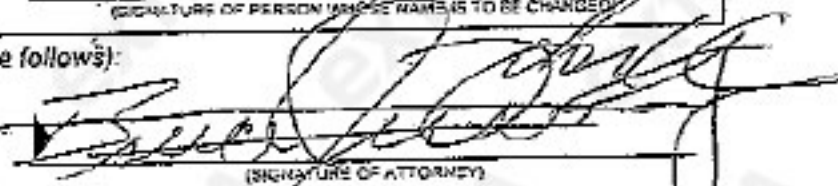
f. If the person whose name will be changed is 18 years of age or older, that person must sign the following declaration:

DECLARATION	
I declare under penalty of perjury under the laws of the State of California that <input checked="" type="checkbox"/> I am not <input type="checkbox"/> I am under the jurisdiction of the California Department of Corrections (in state prison or on parole) and <input checked="" type="checkbox"/> I am not <input type="checkbox"/> I am required to register as a sex offender under Penal Code section 290.	
Date: _____	
<u>William Bruce Jenner</u> (TYPE OR PRINT NAME OF PERSON WHOSE NAME IS TO BE CHANGED)	_____ (SIGNATURE OF PERSON WHOSE NAME IS TO BE CHANGED)

(If petitioner is represented by an attorney, the attorney's signature follows):

Date: 9/15/2015

John L. Krieger  
(TYPE OR PRINT NAME)

  
\_\_\_\_\_  
(SIGNATURE OF ATTORNEY)

(Each petitioner must sign this petition in the space provided below or, if additional pages are attached, at the end of the last attachment.) I declare under penalty of perjury under the laws of the State of California that the information in the foregoing petition is true and correct.

Date: 7/29/16

William Bruce Jenner  
(TYPE OR PRINT NAME)

  
\_\_\_\_\_  
(SIGNATURE OF PETITIONER)

Date: \_\_\_\_\_  
\_\_\_\_\_  
(TYPE OR PRINT NAME)

\_\_\_\_\_  
(SIGNATURE OF PETITIONER)

ADD ADDITIONAL SIGNATURE LINES FOR ADDITIONAL PETITIONERS  SIGNATURE OF PETITIONERS FOLLOWS LAST ATTACHMENT

NC-210/NC-310

PETITION OF (Name): <b>William Bruce Jenner</b>	CASE NUMBER: <b>SS025720</b>
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Page 1 of 3

**DECLARATION OF PHYSICIAN  
 DOCUMENTING CHANGE OF GENDER THROUGH CLINICALLY APPROPRIATE TREATMENT  
 UNDER HEALTH AND SAFETY CODE SECTIONS 103425 AND 103430**

Attachment to *Petition for Change of Name and Gender* (form NC-200) or *Petition for Change of Gender and Issuance of New Birth Certificate* (form NC-300)

See Declaration of Physician attached hereto.

I declare under penalty of perjury under the laws of the State of California that the information in the foregoing declaration is true and correct.

Date:

\_\_\_\_\_  
 (TYPE OR PRINT NAME OF PHYSICIAN)

\_\_\_\_\_  
 (SIGNATURE OF PHYSICIAN)

**FILED**  
Superior Court of California  
County of Los Angeles

SEP 15 2015

By Deanna Smith Deputy  
Sherri B. Carter, Executive Officer/Clerk

1 **DICKINSON WRIGHT PLLC**  
2 JENNIFER KO CRAFT (*Pro hoc vice to be submitted*)  
3 Nevada Bar No. 8038  
4 Email: [REDACTED]  
5 JOHN L. KRIEGER (CA Bar No. 212325)  
6 Email: [REDACTED]  
7 JOANNA M. MYERS (CA Bar No. 289485)  
8 Email: [REDACTED]  
9 [REDACTED]  
10 [REDACTED]  
11 Tel: [REDACTED]  
12 Fax: [REDACTED]  
13 *Attorneys for William Bruce Jenner*

9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
10 **FOR THE COUNTY OF LOS ANGELES**

11 **SS025720**

12 In the matter of

13  
14 WILLIAM BRUCE JENNER,  
15

16  
17 Petitioner.  
18

19 CASE NO.:  
20 EX PARTE  
21 NOTICE OF MOTION AND MOTION TO  
22 FILE UNDER SEAL PORTIONS OF  
23 PETITION FOR CHANGE OF NAME  
24 AND GENDER RELATING TO  
25 PETITIONER'S PRIVACY  
26 AND REQUEST FOR A PRIVATE  
27 HEARING; MEMORANDUM OF POINTS  
28 AND AUTHORITIES; DECLARATION  
OF WILLIAM BRUCE JENNER

Date: 9/15/15  
Time: \_\_\_\_\_  
Dept.: K  
Judge: Hon. Gerald Rosenberg

22 PETITIONER HEREBY NOTIFIES ALL INTERESTED PARTIES THAT on  
23 \_\_\_\_\_, 2015, at \_\_\_\_\_ a.m. in Department K of this Court, located at 1725  
24 Main Street, Santa Monica, California 90401, Petitioner William Bruce Jenner will move the  
25 Court for an Order pursuant to California Civil Procedure Code Section 1277(b)(5) and  
26 California Rule of Court 2.550 and 2.551 allowing Petitioner to file both a redacted and an un-  
27 redacted Petition for Change of Name and Gender and Name Change Criminal History  
28

NOTICE OF MOTION AND MOTION TO FILE UNDER SEAL PORTIONS OF PETITION FOR CHANGE OF NAME AND GENDER RELATING TO PETITIONER'S PRIVACY; DECLARATION OF JOHN L. KRIEGER

DICKINSON WRIGHT LLC

8343 West Sunset Road, Suite 200  
Las Vegas, Nevada 89113-2210



1 Assessment (collectively, "Petition") with Petitioner's home address, medical information, date  
 2 of birth, age, ethnicity, Social Security number, and driver's license number (collectively,  
 3 "Petitioner's Personal Information"). Petitioner requests the Court seal the un-redacted version  
 4 of the Petition and use it only for consideration of the Petition, and allow Petitioner to file a  
 5 redacted version of the Petition on the public record.

6 This Motion does not seek to hide the fact that Petitioner has filed the Petition, but only  
 7 keep private on the public record the portions that disclose Petitioner's Personal Information.  
 8 Accordingly, the public will have access to a redacted version all of the information contained in  
 9 the Petition, other than Petitioner's Personal Information, as well as the Court's ultimate order on  
 10 the Petition and the registrar of actions.

11 This application is made on the grounds that a sealing order is required under California  
 12 Civil Procedure Code section 1277(b)(5) and California Rule of Court 2.550(d) because the facts  
 13 establish:

- 14 1. There exists an overriding interest that overcomes the right of public access to the
- 15 records;
- 16 2. The overriding interest supports sealing the record;
- 17 3. A substantial probability exists that the overriding interest will be prejudiced if
- 18 the record is not sealed;
- 19 4. The proposed sealing is narrowly tailored; and
- 20 5. No less restrictive means exist to achieve the overriding interest.

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DICKINSON WRIGHT  
 [Redacted]

1 This Motion is based on this Notice of Motion, the attached Memorandum of Points and  
2 Authorities and Declaration of William Bruce Jenner, the pleadings and documents filed herein,  
3 and such argument as may be presented in connection with the Motion.

4 Dated: September 15, 2015.

5 Respectfully submitted,

6 DICKINSON WRIGHT PLLC

7 


8 JENNIFER KO CRAFT (*Pro hoc vice to be submitted*)

9 JOHN L. KRIEGER (CA Bar No. 212325)

10 JOANNA M. MYERS (CA Bar No. 289485)

11 

12 *Attorneys for Petitioner William Bruce Jenner*

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DICKINSON WRIGHT  


1 MEMORANDUM OF POINTS AND AUTHORITIES

2 **I. INTRODUCTION**

3 Petitioner William Bruce Jenner<sup>1</sup> respectfully submits this Memorandum of Points and  
 4 Authorities and requests the Court permit Petitioner to file under seal the private information  
 5 contained within Petitioner's Petition for Change of Name and Gender, Name Change Criminal  
 6 History Assessment, and the supporting documents thereto (collectively, the "Petition").  
 7 Petitioner specifically requests that her home address, medical information, date of birth, age,  
 8 ethnicity, Social Security number, and driver's license number (collectively, "Petitioner's  
 9 Personal Information") be sealed and reviewed only in camera to protect it from public  
 10 disclosure. As discussed in more detail below, Petitioner's constitutional rights to privacy and  
 11 safety override the right of public access to the record. In addition, in the event a hearing is  
 12 required in this case, Petitioner requests a private hearing.

13 **II. FACTUAL BACKGROUND**

14 Petitioner is a world-famous Olympic gold medal-winning athlete and popular television  
 15 personality. (See attached hereto Declaration of William Bruce Jenner ("Jenner Decl.") ¶ 3.) For  
 16 nearly forty years, Petitioner has been in the public eye, appearing on television and in movies,  
 17 making endorsements and commercials, and appearing at public speaking engagements. (*Id.* ¶  
 18 4.) In recent years, Petitioner has appeared on the well-known television reality series titled  
 19 "Keeping Up With the Kardashians," broadcast throughout the world. (*Id.* ¶ 5.) Given  
 20 Petitioner's fame, she has long been the object of significant public and media interest.

21 Earlier this year, Petitioner made headlines world-wide by publically announcing that  
 22 Petitioner is transgender and identifies as a woman. (*Id.* ¶ 6.) Although public support for her  
 23 transition has been overwhelmingly supportive, she is also receiving unwelcome negative  
 24 attention from private citizens, including threats of bodily harm. (*Id.* ¶ 7.) Petitioner now seeks  
 25 to change her legal name and gender pursuant to California Code of Civil Procedure § 1275 *et*  
 26 *seq.* in order to conform to her gender identity. In order to accomplish this, Petitioner must file

27  
 28 <sup>1</sup> Hereinafter, this Motion shall use feminine pronouns, when referring to Petitioner.

1 documents with the court that contain Petitioner's Personal Information. See Cal. Civ. Proc.  
 2 Code § 1276(a); see also Forms NC 110 and LACIV 109. Given Petitioner's substantial fame, if  
 3 the Petition is publically filed containing Petitioner's Personal Information, such information will  
 4 be disseminated rapidly to the public through, among other means, television and Internet  
 5 sources, thereby compromising her personal safety and privacy. (Jenner Decl. at ¶ 8-10.)  
 6 Petitioner therefore requests this Court enter an order allowing her to redact Petitioner's Personal  
 7 Information from the publically filed version of the Petition and file the unredacted version under  
 8 seal.

9 Notably, Petitioner is not seeking to seal the Petition in its entirety. (*Id.* at ¶ 11.) Rather,  
 10 Petitioner has tailored her request as narrowly as possible by only asking for Petitioner's  
 11 Personal Information to be redacted. The public will have access to the redacted version of the  
 12 Petition, as well as the Court's order granting the Petition, which should satisfy any interest the  
 13 public may have in Petitioner's name and gender change. Pending this Court's determination,  
 14 Petitioner has filed redacted versions of the Petition and lodged a sealed copy of the unredacted  
 15 documents with the Court pursuant to Rule 2.551(d).

### 16 III. LEGAL ARGUMENT

#### 17 A. Legal Standard for Filing Documents Under Seal

18 This Motion, which seeks an order to file under seal certain portions of the Petition, is  
 19 subject to the standard and procedures set forth in California Civil Procedure Code section  
 20 1277(b)(5) and California Rules of Court, rules 2.550<sup>2</sup> and 2.551. Under these rules, a petitioner  
 21 for a change of name and gender may request that the court file the petition and any other papers  
 22 associated with the proceeding under seal if it finds facts that establish:

- 23 (a) There exists an overriding interest that overcomes the right of public access to the
- 24 record;
- 25 (b) The overriding interest supports sealing the record;

26  
 27 <sup>2</sup> Petitioner recognizes Rule 2.550(a)(2) protects Social Security and driver's license numbers  
 28 from disclosure, but has included them in the request to seal as part of the overall information  
 that should be protected from disclosure.



1 (c) A substantial probability exists that the overriding interest will be prejudiced if  
2 the record is not sealed;

3 (d) The proposed sealing is narrowly tailored; and

4 (e) No less restrictive means exist to achieve the overriding interest.

5 Cal. Civ. Proc. Code § 1277(b)(5); Cal. R. Ct. 2.550(d); *see also* Advisory Committee Comment  
6 to Cal. R. Ct. 2.550 (“Courts have found that, under appropriate circumstances, various statutory  
7 privileges, trade secrets, and privacy interests, when properly asserted and not waived, may  
8 constitute ‘overriding interests’”) (emphasis added).

9 In this case, all five factors are present and support sealing the unredacted Petition.  
10 Petitioner’s constitutional rights of safety and privacy override the public right of access to the  
11 Petition. Further, there exists a substantial probability that Petitioner’s safety and privacy will be  
12 compromised should certain personal information contained in the Petition be made public.  
13 However, cognizant of the need to narrowly tailor the request and find the least restrictive  
14 means, Petitioner does not seek to keep the entire Petition under seal. Instead, Petitioner filed a  
15 redacted Petition that removes Petitioner’s Personal Information from the public record, but  
16 keeps a record of the request to change Petitioner’s name and gender publicly available.  
17 Accordingly, sealing the unredacted version of the Petition would be proper in this case.

18 1. *Petitioner’s Constitutional Rights of Safety and Privacy Override the*  
19 *Right of Public Access to the Petition and Support Sealing the*  
20 *Unredacted Petition*

21 California law has long recognized the Court’s ability to seal documents and restrict  
22 public access to them in certain situations. *See* Cal. R. Ct. 2.550, 2.551. Although there is a  
23 general presumption that court-filed documents should be accessible to the public, the  
24 presumption is not absolute. The presumption can be overcome upon a showing that: (i) there  
25 exists an overriding interest supporting sealing; (ii) there is substantial probability the overriding  
26 interest will be prejudiced absent sealing; (iii) the proposed sealing is narrowly tailored to serve  
27 the overriding interest; and (iv) there is no less restrictive means of achieving the overriding  
28 interest. *NBC Subsidiary (KNBC—TV), Inc. v. Superior Court*, 20 Cal. 4<sup>th</sup> 1178, 1211 & 1217-

1 18 (1999). Two such overriding interests are an individual's constitutional rights of safety and  
2 privacy. *See Burkle v. Burkle*, 135 Cal. App. 4<sup>th</sup> 1045, 1061 (Cal. Ct. App. 2006).

3 California recognizes the rights of safety and privacy as inalienable. The California  
4 Constitution provides: "All people are by nature free and independent and have inalienable  
5 rights. Among these are enjoying and defending life and liberty, acquiring, possessing, and  
6 protecting property, and pursuing and obtaining safety, happiness, and privacy." Cal. Const., art.  
7 1 § 1 (emphasis added). In light of this provision, California courts have recognized an  
8 individual's right to privacy and safety may be sufficient to compel a court to seal certain  
9 documents or override other interests regarding public disclosure. *See Burkle*, 135 Cal. App. 4<sup>th</sup>  
10 at 1063. For example, the California Rules of Court expressly mandate an individual's Social  
11 Security number, ethnicity, age, gender, driver's license number, and date of birth be excluded  
12 from the Court's electronic calendar, index, and register of actions. *See Cal. R. Ct. 2.507(c)*.  
13 Public disclosure of such personal information may also violate the Constitution of the United  
14 States. As stated by the Ninth Circuit, "[i]n an era of rampant identity theft," the public  
15 disclosure of "social security numbers accompanied by names and addresses, may implicate the  
16 [federal] constitutional right of privacy." *See In re Crawford*, 194 F.3d 954, 958 (9th Cir.  
17 1999).

18 More importantly, Petitioner is transgender, making her privacy and safety of particular  
19 concern. California lawmakers recently acknowledged the heightened need for protecting the  
20 privacy and safety of transgender individuals while seeking a court ordered name and gender  
21 change. The public nature of the name and gender change process exposes transgender  
22 individuals to potential discrimination, harassment or even violence because of being  
23 transgender. Press Release, Toni G. Atkins Speaker of the Assembly, Oct. 08, 2013, *available at*  
24 [http://asmdc.org/speaker/news-room/press-releases/atkins-bill-to-streamline-transgender-name-](http://asmdc.org/speaker/news-room/press-releases/atkins-bill-to-streamline-transgender-name-changes-signed-by-governor)  
25 [changes-signed-by-governor](http://asmdc.org/speaker/news-room/press-releases/atkins-bill-to-streamline-transgender-name-changes-signed-by-governor). As stated by Assembly Majority Leader Toni Atkins,  
26 "Transgender people are entitled to have their official documents and their legal name reflect  
27 their true identity without a burdensome and expensive process that endangers their personal  
28 safety." *Id.* In response to the privacy and safety risks faced by transgender individuals, Speaker

1 Atkins sponsored Assembly Bill 1121, which amended California Civil Procedure Code § 1227.  
 2 The express purpose of this amendment was to make it easier and safer for transgender  
 3 individuals to seek a name and gender change. *Change of Name—Petitioners—Gender Identity*,  
 4 Assem. Bill 1121, Reg. Sess. 2013. As a result of this amendment, Section 1227(a)(5) now  
 5 provides that a petitioner seeking a name change to conform to his/her gender identity is exempt  
 6 from the requirement for publication, which is required for other name changes. Cal. Civ. Proc.  
 7 Code § 1277(a)(5). In addition, Section 1227(a)(1) provides that if no objection to the name  
 8 change is timely filed, the court shall grant the petition without a hearing. Cal. Civ. Proc. Code §  
 9 1227(a)(1). These two significant changes in the law were made to help alleviate the harassment  
 10 and danger faced by transgender individuals when their transgender status becomes publically  
 11 known.

12 Here, Petitioner's safety and privacy interests override the public's right of access to  
 13 Petitioner's Personal Information contained in the unredacted Petition. (See Jenner Decl. ¶ 8.)  
 14 Although Petitioner's transgender status is publically known, she is still entitled to keep  
 15 Petitioner's Personal Information private. Moreover, as recognized by California's lawmakers,  
 16 the potential for discrimination, harassment or even violence against Petitioner exists simply for  
 17 being transgender. If the unredacted Petition were to be made publicly available, Petitioner's  
 18 Personal Information would most likely be immediately and widely disseminated by the media  
 19 and place her safety and privacy at risk. (*Id.* ¶ 9.) Thus, Petitioner's overriding interests in  
 20 safety and privacy support sealing the unredacted version of the Petition and making only the  
 21 redacted version publicly available. See Cal. Civ. Proc. Code § 1277(b)(5)(B, C); Cal. R. Ct.  
 22 2.550(d)(2), (3). (See also Jenner Decl. ¶ 8-10.)

23 2. *The Proposed Sealing Is as Narrowly Tailored as Possible and no*  
 24 *Less Restrictive Means Exist to Achieve the Overriding Interests*

25 Petitioner's request to seal the Petition is as narrowly tailored as possible and no less  
 26 restrictive means exist to protect her overriding interests of privacy and safety. (See Jenner Decl.  
 27 ¶ 11.) See also Cal. Civ. Proc. Code § 1277(b)(5)(E); Cal R. Ct. 2.550(d)(4), (5). A narrowly  
 28 tailored request to seal is one that restricts public access to only that portion of the record as is



1 required to protect the overriding interest. *See Burkle*, 135 Cal. App. 4<sup>th</sup> at 1065-66. For  
 2 example, a request to redact only certain specific information from a document, the disclosure of  
 3 which threatens an overriding interest, would be deemed narrowly tailored. *See id.* In contrast, a  
 4 request to seal an entire document, which happens to contain some information that would cause  
 5 prejudice to an overriding interest if disclosed, would not be "narrowly tailored" because  
 6 redaction is a less restrictive means of protecting the overriding interest. *See id.* Petitioner's  
 7 request to keep only the redacted version of the Petition on the public record is therefore  
 8 narrowly tailored to protect her overriding interests (keeping Petitioner's Personal Information  
 9 private; right to safety and privacy) and is the least restrictive means (redaction) to protect those  
 10 interests.

11 Moreover, the purpose of the statutory procedure for formally changing one's name is to  
 12 have, wherever possible, an official record of the change. *In re Forchion*, 198 Cal. App. 4<sup>th</sup>  
 13 1284, 1305 (Cal. App. Ct. 2011). In this case, the public will not be denied an official record of  
 14 the Petition because the redacted version will still be on the public record, as well as the Court's  
 15 ultimate order and the registrar of action. (*See Jenner Decl.* ¶ 11.). Accordingly, an official  
 16 record of the name and gender change will be public.

17 **B. Petitioner's Request for a Private Hearing**

18 Under California Civil Procedure Code § 1277, if no objection is timely filed to a petition  
 19 for change of name based on the petitioner's wish to conform to his/her gender identity, the  
 20 Court shall grant the petition without a hearing. Cal. Civ. Proc. Code § 1277(a)(1). Petitioner  
 21 does not anticipate any objections and a hearing in this matter will most likely not be required.  
 22 That said, due to the safety and privacy concerns discussed herein, should a hearing be required,  
 23 Petitioner respectfully requests this Court grant her a private hearing.

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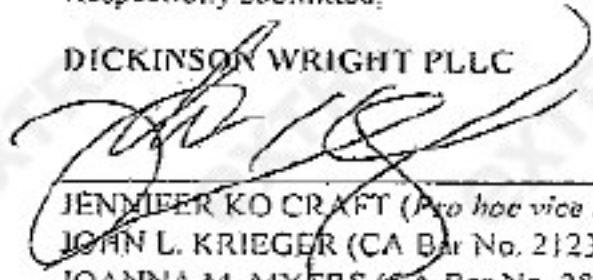
CONCLUSION

For the foregoing reasons, Petitioner respectfully requests the Court enter an order: (1) allowing Petitioner to file a redacted version of the Petition on the public record; and (2) instructing the Clerk of the Court to seal the unredacted version of the Petition already lodged with the Court; and (3) granting the Petitioner a private hearing

DATED this 15<sup>th</sup> day of September 2015.


Respectfully submitted,

DICKINSON WRIGHT PLLC



JENNIFER KO CRAFT (*Pro hoc vice to be submitted*)  
JOHN L. KRIEGER (CA Bar No. 212325)  
JOANNA M. MYERS (CA Bar No. 289485)



DICKINSON WRIGHT  


1                                    **DECLARATION OF WILLIAM BRUCE JENNER**  
 2                                    **IN SUPPORT OF MOTION TO FILE UNDER SEAL PORTIONS OF PETITION FOR**  
 3                                    **CHANGE OF NAME AND GENDER RELATING TO PETITIONER'S PRIVACY**  
    **AND REQUEST FOR A PRIVATE HEARING**

4            I, William Bruce Jenner, declare:

5            1.        I submit this declaration in support of Petitioner's Motion to File Under Seal  
 6            Portions of Petition for Change of Name and Gender Relating to Petitioner's Privacy and  
 7            Request for a Private Hearing.

8            2.        I am seeking to change my legal name and gender to conform to my gender  
 9            identity. In order to accomplish this, I must file a Petition for Change of Name and Gender and  
 10           Name Change Criminal History Assessment (collectively, "Petition"), which requires me to  
 11           disclose my home address, personal medical information, date of birth, age, ethnicity, social  
 12           security number, and driver's license number (collectively, "Personal Information").

13           3.        I am an Olympic gold medal-winning athlete and popular television personality.

14           4.        For nearly forty years, I have been in the public eye, appearing on television and  
 15           in movies, making endorsements and commercials, and making public speaking engagements.

16           5.        In recent years, I have appeared on the well-known television reality series titled  
 17           "Keeping Up With the Kardashians."

18           6.        Earlier this year, I publically announced that I am transgender and identify as a  
 19           woman. The news made headlines worldwide and continues to do so.

20           7.        Although public support for my transition has been overwhelmingly supportive, I  
 21           am also receiving unwelcome negative attention from private citizens, including threats of bodily  
 22           harm.

23           8.        I believe I have overriding interests in my safety and privacy that will be  
 24           prejudiced should my Personal Information be made public.

25           9.        Although my transgender status is publically known, my Petition contains my  
 26           Personal Information. If the Petition were published in an un-redacted form, I have a reasonable  
 27           belief, based upon significant media attention I have received recently and over the years, that it  
 28           would be rapidly and widely disseminated to the public through, among other things, television