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IN THE COURT OF APPEAL OF THE STATE OF CALIFORNIA
SIXTH APPELLATE DISTRICT

Conservatorship of the Person of C.O.

**MARY ANN WARREN, AS PUBLIC
GUARDIAN, ETC.,**

Petitioner and Respondent,

v.

C.O.,

Objector and Appellant.

No. H048150

(Santa Clara County
Superior Court No.
MH032662)

**APPLICATION TO FILE APPELLANT'S OPENING BRIEF
UNDER SEAL**

TO THE PRESIDING JUSTICE, AND TO THE HONORABLE
ASSOCIATE JUSTICES OF THE COURT OF APPEAL OF THE
STATE OF CALIFORNIA, SIXTH APPELLATE DISTRICT:

Appellant, through counsel, hereby requests his opening
brief be filed under seal, and to file concurrently a public redacted
brief. This request is made under California Rules of Court, rules,
8.47(c) [filings referring to confidential materials].

This application to file appellant's opening brief under seal
is based on the record in this appeal and the attached declaration
of counsel. (Cal. Rules of Court, rule 8.46(f).)

April 1, 2022

Respectfully submitted,

/s/ Joseph Doyle
Joseph Doyle
Attorney for Appellant
C.O.

DECLARATION OF COUNSEL

I, Joseph Doyle, declare:

1. I am an attorney licensed to practice law in California, State Bar No. 271447. I am a Staff Attorney with the Sixth District Appellate Program (SDAP), and have been appointed to represent appellant, C.O., on appeal in Case No. H048150. The record on appeal includes the declarations of two physician's concerning appellant's mental health. (1CT 12-14.) Those declarations were designated by the trial court as confidential when the record was filed with this Court.
2. As these confidential declarations formed part of the basis for the continued conservatorship, I referenced these declarations in appellant's opening brief. Material that is confidential and is part of the record on appeal may not be disclosed publicly. (Cal. Rules of Court, rule 8.47(c)(1).) Accordingly, the procedures under rule 8.47(c)(2) apply here and I am therefor filing this application.
3. Rule 8.47(c)(2), requires that, if it is necessary to disclose confidential material in a filing in the reviewing court, two versions must be filed. There must be a public redacted version. The cover of this version must identify it as "Public-Redacts material from conditionally sealed record." There must also be an unredacted version. The cover of this version, must identify it as "May Not Be Examined Without Court Order – Contains material from conditionally sealed record." Following these procedures, a redacted and unredacted version of appellant's opening brief was filed via TrueFiling on April 1, 2022.

Under rule 8.47, I respectfully request that this court permit appellant permission to file the unredacted opening brief under seal, and to file concurrently the public redacted version of Appellant's Opening Brief. Both were filed via TrueFiling on April 1, 2022.

I declare under penalty of perjury under the laws of the

state of California that the foregoing is true and correct.

Executed at San Jose, California, on April 1, 2022.

/s/ Joseph Doyle
Joseph Doyle