

DOCKET NO. MMX-FA-12-4018627-S : SUPERIOR COURT
: :
TANYA TAUPIER : J.D. OF MIDDLESEX
: :
VS. : AT MIDDLETOWN
: :
EDWARD TAUPIER : AUGUST 13, 2019
: :

PLAINTIFF'S MOTION FOR PROTECTIVE ORDER, POST JUDGMENT

Pursuant to Practice Book §13-5 and the Court's inherent authority, the plaintiff, Tanya Taupier, respectfully requests that the court enter an order prohibiting the defendant, Edward Taupier, from disseminating to any third party (excluding his counsel) any documents offered into evidence during the hearing in the above-captioned matter, including by means of e-mail, text message, social media message or posting, internet posting or through any other means of dissemination.

In support thereof, the plaintiff represents as follows:

1. On August 28, 2015, the marriage of the parties was dissolved pursuant to a Memorandum of Decision following trial (Pinkus, J.).
2. On January 17, 2017, the court (Albis, J.) approved and made an order of the court, the Agreement of the parties' (#225.00), wherein both parties agreed that they and their minor children (currently ages 12 and 11) would submit to a psychological evaluation.

3. On February 24, 2017, the court (Domnarski, J.) entered an order that:

Pursuant to the agreement of the parties made an order of the court on January 17, 2017, whereby the parties and the minor children are to submit to a psychological evaluation, and upon the inability of the parties to agree upon the selection of an evaluator, it is hereby ORDERED:

Psychological evaluations of the plaintiff Tanya Taupier, the defendant Edward Taupier, and the parties' minor children Gabriel and Sara, shall be conducted by Dr. Bruce Freedman of Bloomfield, Connecticut.

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4. On July 7, 2017, Dr. Freedman completed his psychological evaluation, but could not make recommendations as to changes to custody or visitation, because the defendant did not participate in the process.

5. On June 14, 2018, the defendant filed a Motion for Contempt. On June 29, 2018, the plaintiff filed a Motion to Modify and a Motion for Contempt. Such motions were heard on December 5-6, 2018.

6. On December 13, 2018, the Court (Albis, J.) entered orders *inter alia* modifying the parenting orders to suspend the defendant's access to the minor children pending further hearing. The supplemental hearing contemplated by the Court's orders is scheduled for August 20, 2019.

7. The plaintiff anticipates that a variety of documents will be submitted during the hearing that contain confidential and private information pertaining to the minor children and the plaintiff, including but not limited to school and financial records.

8. The defendant has a history of posting on the internet, and/or taking other actions such that pictures, videos, court documents and other information pertaining to this litigation are posted on the internet, as well as disseminating such information to other individuals with no involvement in this matter.

9. The children's and the plaintiff's right to privacy and confidentiality as to the matters contained documents to be submitted as evidence during the hearing, and their right to be free from annoyance, harassment and/or embarrassment as to the same, requires a protective order prohibiting the defendant from disseminating any such information.

WHEREFORE, the plaintiff respectfully requests that the court enter a protective order prohibiting the defendant from disseminating to any third party any documents offered into evidence during the hearing in the above-captioned matter, including by means of e-mail, text message, social media message or posting, internet posting or through any other means of dissemination; and such other and further relief as the court deems proper.

The Plaintiff,
Tanya Taupier



BY: _____

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Her Attorneys

CERTIFICATION

I certify that a copy of the above was or will immediately be mailed or delivered electronically or non-electronically on August 13, 2019, to all counsel and self-represented parties of record and that written consent for electronic delivery was received from all counsel and self-represented parties of record who were or will immediately be electronically served.

Mr. Edward Taupier
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Anne C. Dranginis
Commissioner of the Superior Court