

NORTH CAROLINA  
WAKE COUNTY

IN THE GENERAL COURT OF JUSTICE  
DISTRICT COURT DIVISION  
FILE NO. \_\_\_\_\_

Assigned Judge: \_\_\_\_\_

**In the matter of:**  
\_\_\_\_\_  
\_\_\_\_\_

**MOTION IN OPPOSITION  
TO PRODUCTION  
OF RECORDS**

Attorney for \_\_\_\_\_, moves this Honorable Court, for an order prohibiting production of confidential juvenile records. In support of this motion, the undersigned respectfully shows the following:

1. On (date) \_\_\_\_\_, a Motion to Examine and Produce was filed by (name of party who is requesting document(s)) \_\_\_\_\_.
2. On (date) \_\_\_\_\_, (name of party who is requesting document(s)) \_\_\_\_\_ reviewed the file.
3. Pursuant to Wake County Local Rule 12.1, (name of party who is requesting documents) \_\_\_\_\_ requested a copy of certain documents located within the juvenile's file, specifically, (list document(s) requested to be produced). This request was made on (date) \_\_\_\_\_.
4. The undersigned objects to the production of the above-named document(s) for the following reasons:
  - a. List reason for objection.  
\_\_\_\_\_  
\_\_\_\_\_
  - b. List reason for objection.  
\_\_\_\_\_  
\_\_\_\_\_
7. The undersigned acknowledges the above listed objections are not merely based upon confidentiality and that production of the requested document(s) would result in severe prejudice to another party.
8. The interests of Wake County Human Services in keeping the above-named document(s) confidential outweighs the need of (name of party who is requesting document(s)) to have a copy of the document(s) \_\_\_\_\_.
9. The best interests of the above-named juveniles would be served by this Court prohibiting the production of the requested document(s).

This the \_\_\_\_ day of \_\_\_\_\_, 20\_\_.

\_\_\_\_\_  
Name  
Attorney for (name of client)  
\_\_\_\_\_

**CERTIFICATE OF SERVICE**

THIS IS TO CERTIFY that the foregoing Motion in Opposition to Production of Records was served on the parties by mailing a copy thereof to their attorneys, first class mail, postage prepaid, addressed as follows:

\_\_\_\_\_  
Wake County Attorney's Office  
P.O. Box 550  
Raleigh, NC 27602

\_\_\_\_\_  
GAL Attorney Advocate  
P.O. Box 1107  
Raleigh, NC 27602

This the \_\_\_\_ day of \_\_\_\_\_, 20\_\_ .

\_\_\_\_\_  
*Attorney for Parent*