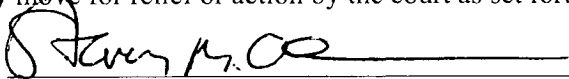


STATE OF SOUTH CAROLINA )  
 )  
 COUNTY OF CHARLESTON )  
 )  
 MARK BEALE )  
 \_\_\_\_\_ )  
 Plaintiff, )  
 vs. )  
 )  
 JOHN DOE , )  
 \_\_\_\_\_ )  
 Defendant. )

IN THE COURT OF COMMON PLEAS  
 NINTH JUDICIAL CIRCUIT  
 CASE NO.: 2017\_CP-10\_1097  
 MOTION AND ORDER INFORMATION  
 FORM AND COVERSHEET

Plaintiff's Attorney: Steven M. Abrams, Bar No. 76230 Address: 1154 Holly Bend Drive, Mt Pleasant, SC 29466 Phone: 843-216-1100 Fax 843-278-5107 E-mail: steve@abramscyberlaw.com Other:	Defendant's Attorney: _____, Bar No. _____ Address: _____ Phone: _____ Fax: _____ E-mail: _____ Other: _____												
<input checked="" type="checkbox"/> <b>MOTION HEARING REQUESTED (attach written motion and complete SECTIONS I and III)</b> <input type="checkbox"/> <b>FORM MOTION, NO HEARING REQUESTED (complete SECTIONS II and III)</b> <input type="checkbox"/> <b>PROPOSED ORDER/CONSENT ORDER (complete SECTIONS II and III)</b>													
<b>SECTION I: Hearing Information</b>													
Nature of Motion: Motion to Unseal Records Estimated Time Needed: 10 Minutes      Court Reporter Needed: <input checked="" type="checkbox"/> YES / <input type="checkbox"/> NO													
<b>SECTION II: Motion/Order Type</b>													
<input checked="" type="checkbox"/> Written motion attached <input type="checkbox"/> Form Motion/Order I hereby move for relief or action by the court as set forth in the attached proposed order.													
<div style="display: flex; justify-content: space-between; align-items: center;"> <div style="text-align: center;">             _____            Signature of Attorney for <input checked="" type="checkbox"/> Plaintiff / <input type="checkbox"/> Defendant         </div> <div style="text-align: center;">           11/9/2017            Date submitted         </div> </div>													
<b>SECTION III: Motion Fee</b>													
<input checked="" type="checkbox"/> PAID – AMOUNT: \$ _____ <input type="checkbox"/> EXEMPT: (check reason) <table style="width:100%; border: none;"> <tr> <td style="width: 50%;"><input type="checkbox"/> Rule to Show Cause in Child or Spousal Support</td> <td style="width: 50%;"><input type="checkbox"/> Domestic Abuse or Abuse and Neglect</td> </tr> <tr> <td><input type="checkbox"/> Indigent Status    <input type="checkbox"/> State Agency v. Indigent Party</td> <td><input type="checkbox"/> Sexually Violent Predator Act    <input type="checkbox"/> Post-Conviction Relief</td> </tr> <tr> <td><input type="checkbox"/> Motion for Stay in Bankruptcy</td> <td><input type="checkbox"/> Motion for Publication    <input type="checkbox"/> Motion for Execution (Rule 69, SCRPC)</td> </tr> <tr> <td colspan="2"><input type="checkbox"/> Proposed order submitted at request of the court; or, reduced to writing from motion made in open court per judge's instructions</td> </tr> <tr> <td colspan="2">Name of Court Reporter: _____</td> </tr> <tr> <td colspan="2"><input type="checkbox"/> Other: _____</td> </tr> </table>		<input type="checkbox"/> Rule to Show Cause in Child or Spousal Support	<input type="checkbox"/> Domestic Abuse or Abuse and Neglect	<input type="checkbox"/> Indigent Status <input type="checkbox"/> State Agency v. Indigent Party	<input type="checkbox"/> Sexually Violent Predator Act <input type="checkbox"/> Post-Conviction Relief	<input type="checkbox"/> Motion for Stay in Bankruptcy	<input type="checkbox"/> Motion for Publication <input type="checkbox"/> Motion for Execution (Rule 69, SCRPC)	<input type="checkbox"/> Proposed order submitted at request of the court; or, reduced to writing from motion made in open court per judge's instructions		Name of Court Reporter: _____		<input type="checkbox"/> Other: _____	
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Name of Court Reporter: _____													
<input type="checkbox"/> Other: _____													
<b>JUDGE'S SECTION</b> <input type="checkbox"/> Motion Fee to be paid upon filing of the attached order. <input type="checkbox"/> Other:	JUDGE CODE _____ Date: _____												
<b>CLERK'S VERIFICATION</b>													
Collected by: _____ Date Filed: _____ <input type="checkbox"/> MOTION FEE COLLECTED: \$ _____ <input type="checkbox"/> CONTESTED – AMOUNT DUE: \$ _____													

STATE OF SOUTH CAROLINA )  
COUNTY OF CHARLESTON )  
MARK BEALE, )  
Plaintiff, )  
v. )  
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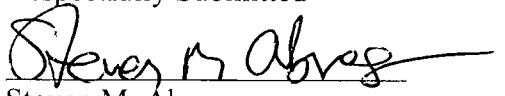
IN THE COURT OF COMMON PLEAS  
NINETH JUDICIAL CIRCUIT  
CASE NO: 2017-CP-10-1097

**PLAINTIFF'S MOTION TO**  
**UNSEAL RECORDS**

FILED  
NOV -9 AM 10:45  
JULIE R. ARMSTRONG  
CLERK OF COURT  
BY

COMES NOW, Plaintiff Mark Beale, and moves that the honorable Court unseal certain Internet subscriber records in the above captioned case for the purpose of allowing Plaintiff to learn the identity of John Doe so he can proceed with the litigation of the above captioned matter. Said records are covered by a protective order issued by the Honorable J.C. Nicholson, Jr., on August 23, 2017, restricting access to the identifying records to the undersigned attorney only until further ruling by the Court.

WHEREFORE, the Plaintiff prays that upon hearing the evidence obtained regarding the identity of "John Doe" that the Court allow the subscriber records to be unsealed for the purpose of proceeding with the litigation of the above captioned matter.

Respectfully Submitted  
  
Steven M. Abrams  
Abrams Cyber Law & Forensics, LLC  
1154 Holly Bend Drive  
Mount Pleasant, SC 29464  
(843) 216-1100  
Email: steve@abramscyberlaw.com  
SC Bar #: 76230

November 9, 2017  
Mount Pleasant, South Carolina

ATTORNEY FOR THE PLAINTIFF