

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

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THE PEOPLE OF THE STATE OF NEW YORK, ex rel.	:	Index No:
	:	
ANONYMOUS	:	
	:	
Plaintiff,	:	AFFIDAVIT IN SUPPORT OF
	:	PLAINTIFF's APPLICATION
	:	TO FILE COMPLAINT IN
- against - :	:	CAMERA AND SEAL COURT
	:	FILE
	:	
ANONYMOUS,	:	
	:	
Defendants.	:	
-----	X	

STATE OF NEW YORK)
COUNTY OF NEW YORK) ss.:

XXXX, being duly sworn, hereby deposes and says:

1. I am an attorney duly admitted to practice law before the Courts of the State of New York, and I represent Plaintiff Anonymous in this action under the New York False Claims Act §§ 187 *et seq* (the "**Act**").
2. I make this application for an order of the Court that the file in this action be sealed pursuant to and in accordance with Section 190(2)(b) of the Act.
3. I make application for a further order of the Court that this action be captioned Anonymous v. Anonymous so as to protect the Plaintiff and Defendants respective identities, and to enable the investigation by the office of Attorney General of

the State of New York to proceed efficiently without interference from the Defendants or attracting media attention.

4. If this action were captioned using the Plaintiff's and Defendants' actual names, a routine index search of the court's records would reveal that an action had been commenced.

Using the caption Anonymous v. Anonymous will protect the Plaintiff's and Defendants' identities and, accordingly, will protect (a) Defendants' respective reputations and (b) against Defendants' obtaining advance warning of an action, until such time as the Attorney General's office has completed its investigation of the matters alleged in the filed complaint.

WHEREFORE, on behalf of Plaintiff Anonymous, the undersigned respectfully requests the within applications be granted.

SIGNED: _____

ATTORNEY FOR PLAINTIFF

Sworn to before me
this __ day of May 2011

Notary Public