

Docketed 1/24/24

COMMONWEALTH OF MASSACHUSETTS

NORFOLK, SS.

NORFOLK SUPERIOR COURT

C.A. NO. 2382CV00881

TYLER MARTIN

Plaintiff

vs.

LIONEL FREDERIQUE TARGET

Defendant

PLAINTIFF'S EX PARTE MOTION TO REDACT PRIVATE INFORMATION
ON CIVIL ACTION COVER SHEET

Plaintiff asks that this Court redact from the Civil Action Cover Sheet Plaintiff's residential address. Plaintiff asks this because the failure to redact the residential address will result in an unwarranted invasion of Plaintiff's privacy. Plaintiff seeks this relief *ex parte* because Plaintiff has a reasonable belief that if Defendant becomes aware that Plaintiff's personal residence is now publicly available and that Plaintiff fears for disclosure of the address that Defendant will publish Plaintiff's address in online forums.

As explained in the attached Affidavit, Plaintiff has a large online following in the gaming community under a pseudonym. Exhibit A. Plaintiff fears that if and when his followers become aware of this litigation, they will access the online docket and review the filings, which includes the Civil Action Cover sheet that discloses Plaintiff's residential address. Exhibit A. Plaintiff fears that some of his followers may engage in harassing or threatening behavior at Plaintiff's residence. Exhibit A.

As this Court is aware, exemptions to the public records law should be applied in a case-by-case basis. Torres v. Attorney General, 391 Mass 1 (1984). A court may redact such information if the disclosure of information constitutes an unwarranted invasion of personal privacy. See Boston Globe Media Partners, LLC v. Department of Public Health, 482 Mass. 427 (2019). To determine this, a court should balance the public interest in obtaining the requested information versus the seriousness of the invasion of privacy. *Id.* Only if the public interest substantially outweighs the seriousness of the invasion of privacy should a court keep the information public. *Id.*

Plaintiff cannot discern what value his residential address would be to the public. In weighing the public interest versus the serious harm that could befall Plaintiff if hundreds of thousands of internet users who follow Plaintiff learn of his residential address. Plaintiff therefore asks that the Court redact his residential address from the Civil Action Cover Sheet.

Respectfully Submitted,

The Plaintiff,
By his Attorneys,

Law Offices of Beauregard, Burke & Franco

/s/Adrienne Catherine H. Beauregard-Rheaume
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Dated: January 24, 2024

Exhibit A

COMMONWEALTH OF MASSACHUSETTS

NORFOLK, SS.

NORFOLK SUPERIOR COURT
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TYLER MARTIN

Plaintiff

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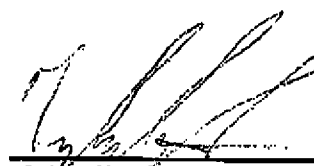
**AFFIDAVIT OF TYLER MARTIN IN SUPPORT OF
MOTION TO REDACT**

I, Tyler Martin, being first duly sworn, depose and state as follows:

1. I am an individual over the age of 18 residing in the State of Kansas.
2. The facts set forth herein are stated from my personal knowledge, and if called as a witness I could and would testify competently as to the same.
3. I earn my living as a content creator and live streamer of video game-related content, primarily concerning the popular game Final Fantasy XIV.
4. At present, I have approximately 140,000 followers of my Twitch account, including approximately 4,000 subscribers, who pay a monthly fee for access to subscription-based content.
5. I also operate a YouTube channel with approximately 92,000 followers, and host a Discord server, which members can use to communicate directly with one another.
6. I use the name Xenosys Vex on the foregoing platforms, and I am identifiable by that name and "Xeno."

7. I fear that if and when my followers become aware of this litigation, they will access the online docket and review the filings.
8. One of the filings in this matter, which I understand is called the Civil Action Cover sheet, discloses my residential address.
9. I fear that some of my followers will use this private information to harass or threaten me at my personal residence.

Signed under the pain and penalty of perjury this 22 day of January, 2024.



Plaintiff Tyler Martin

STATE OF Kansas

COUNTY OF Sedgwick SS

On this 22 day of January, 2024, Plaintiff Tyler Martin did appear before me, the undersigned notary public, proved to me through satisfactory evidence of identification to be the person whose name is signed on the attached document, and acknowledged to me that he signed it voluntarily for its stated purpose.

