

IN THE ALABAMA COURT OF THE JUDICIARY

**FILED**

MAR - 3 2021

IN THE MATTER OF:

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JOHN RANDALL "RANDY" JINKS  
PROBATE JUDGE  
TALLADEGA COUNTY

CASE NO. 57

COURT OF THE JUDICIARY  
Rebecca C. Oates  
Secretary

**MOTION TO FILE MODIFIED COMPLAINT UNDER SEAL**

COMES NOW, the Judicial Inquiry Commission ("Commission"), and respectfully moves this Honorable Court to allow the Commission to file its "Modified Complaint" in the above-styled case under seal. The Commission states as follows:

1. Due to the sensitive nature of the allegations alleged in the Complaint, the Commission's Complaint uses initials to identify the employees and other individuals mentioned therein.
2. The sole distinction between the Complaint and "Modified Complaint," which the Commission is requesting be filed under seal, is that the latter identifies the employees and other individuals mentioned therein by their names.
3. The Commission's purpose for seeking permission to file "Modified Complaint" under seal is for the benefit of the Court

and the parties and their attorneys, i.e., for easier identification of the actors involved.

WHEREFORE, premises considered, the Commission respectfully requests this Honorable Court to accept the Commission's "Modified Complaint" in the above-styled case under seal.

RESPECTFULLY submitted this the 3rd day of March, 2021.

/s/ Elizabeth C. Bern  
Elizabeth C. Bern  
Attorney for the Commission  
Alabama Judicial Inquiry Commission  
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(334) 242-4089

### **CERTIFICATE OF SERVICE**

I hereby certify that I have, on this 3rd of March, 2021, electronically filed the foregoing with the Court of the Judiciary, and that I have further served a copy upon the following by placing same in the United States Mail, postage prepaid and properly addressed and/or via email as follows:

Hon. Robert D. Segall  
Hon. John A. Henig, Jr.  
Copeland, Franco, Screws & Gill, PA  
P.O. Box 347  
Montgomery, AL 36101-0347  
[segall@copelandfranco.com](mailto:segall@copelandfranco.com)  
[henig@copelandfranco.com](mailto:henig@copelandfranco.com)

/s/ Elizabeth C. Bern  
OF COUNSEL

IN THE ALABAMA COURT OF THE JUDICIARY

IN THE MATTER OF:

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JOHN RANDALL “RANDY” JINKS  
PROBATE JUDGE  
TALLADEGA COUNTY

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CASE NO. 57

**[PROPOSED] ORDER**

THIS MATTER having come before the Court on the Judicial Inquiry Commission’s Motion to File Modified Complaint Under Seal, and upon consideration thereof and for good cause shown,

**IT IS HEREBY ORDERED** that the Commission’s Motion to File Modified Complaint Under Seal is **GRANTED**. The Court orders the Modified Complaint to be filed under seal.

This the \_\_\_ day of March, 2021.

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Judge J. William Cole  
Chief Judge, Court of the Judiciary