

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA

JANE DOE 1 AND JANE DOE 2,

PETITIONERS,

v.

UNITED STATES OF AMERICA,

RESPONDENT.

Civil Action No.

08-80736-CIV-MARRA

Government's Unopposed Motion To Seal Exhibit

The United States of America, by Byung J. Pak, United States Attorney for the Northern District of Georgia, and Jill E. Steinberg and Nathan P. Kitchens, Special Attorneys for the Southern District of Florida, files this unopposed motion to seal a previously filed exhibit to the government's motion for summary judgment. (Doc. 403).

Exhibit O to that motion mistakenly did not redact the names of two individuals who were known to be minors at the time of the relevant conduct. (Doc. 403-15). Pursuant to Fed. R. Civ. P. 5.2(a), the name of an individual "known to be a minor" must be redacted in civil filings unless the Court orders otherwise. Accordingly, the originally filed exhibit should be placed under seal to protect the privacy of those individuals, and the government respectfully submits that the redacted exhibit attached as Exhibit A to this motion, which removes their names, should be substituted in its place.

Undersigned counsel has conferred with counsel for Petitioners regarding this request, and Paul Cassell has authorized the undersigned to state that the instant motion is unopposed by Petitioners.

WHEREFORE, the government respectfully requests that Exhibit O to its motion for summary judgment, Doc. 403-15, be placed under seal and that the redacted Exhibit A to this motion be substituted in its place.

Respectfully submitted,

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Certificate of Service

I served this document today by filing it using the Court's CM/ECF system, which automatically notifies the parties and counsel of record.

July 15, 2019

/s/ Nathan P. Kitchens

Nathan P. Kitchens

Special Attorney