

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

_____	)	
UNITED STATES OF AMERICA	)	
	)	
v.	)	
	)	
ADIANA PIERRE,	)	Crim No. 24-CR-10007-MJJ
	)	
	)	
Defendant.	)	
_____	)	

**ASSENTED-TO MOTION FOR LEAVE TO FILE MENTAL HEALTH
LETTER AND PORTIONS OF SENTENCING MEMORANDUM UNDER SEAL**

Pursuant to Local Rule 7.2 and the Electronic Case Filing Administrative Procedures Rule I.(1)(a), the Defendant, Ms. Adiana Pierre, by and through her attorney, Michael R. DiStefano, respectfully moves the Court to allow her to file a mental health letter upon which she will rely at sentencing and references to the letter in her forthcoming sentencing memorandum under seal.

As grounds for her motion, Ms. Pierre states that the letter and the portions of her sentencing memorandum referencing it, consist of sensitive and private personal mental health information provided by her mental health counselor, Jack F. West. Undersigned counsel has conferred with Assistant United States Attorney David M. Holcomb who has assented to this motion on behalf of the Government, provided that redacted versions of the sentencing memorandum and letter are filed on the public docket. Ms. Pierre agrees with that condition.

WHEREFORE, Ms. Pierre requests that the Court grant her the relief sought herein.

Respectfully submitted,

Adiana Pierre,

By her attorney,

/s/ Michael R. DiStefano

Michael R. DiStefano (BBO #675615)

Todd & Weld LLP

One Federal Street

Boston, MA 02110

mdistefano@toddweld.com

(617) 720-2626

Dated: May 17, 2024

CERTIFICATE OF SERVICE

I, Michael R. DiStefano, hereby certify that the foregoing document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

/s/ Michael R. DiStefano

Michael R. DiStefano

Dated: May 17, 2024