

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

CARLOS SMITH,

Defendant.

20CR00922
Judge Shah

MOTION FOR LEAVE TO FILE UNDER SEAL

Defendant, CARLOS SMITH, by and through his attorney, Dena M. Singer, respectfully requests this Honorable Court, pursuant to Local Rule 26.2, to allow the defense to file Exhibit 6 of DEFENDANT’S SENTENCING MEMORANDUM AND OBJECTIONS TO THE PRESENTENCE REPORT under seal. In support of this motion, Mr. Smith states the following:

1. Mr. Smith’s sentencing memorandum and objections to the presentence report references exhibit 6, which contains Mr. Smith’s sensitive health information.
2. Because of this sensitive health information, Mr. Smith requests permission to file this document under seal.
3. The defense will provide a copy of this exhibit to the government.

WHEREFORE, Carlos Smith, through counsel, respectfully requests this Honorable Court allow him leave to file exhibit 6 of Defendant’s Sentencing Memorandum and Objections to the Presentence Report under seal.

Respectfully submitted,

s/ Dena M. Singer
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Certificate of Service

I, Dena M. Singer, hereby certify, I caused a copy of the foregoing Motion to be served on upon the Assistant United States Attorney by causing it to be electronically filed with the Clerk of the Court using the CM/ECF system.

/s/ Dena M. Singer
Dena M. Singer