

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO**

Criminal Case Number 23-cr-00074-NYW

UNITED STATES OF AMERICA,

Plaintiff,

v.

DEJANE REANIECE LATTANY

RESTRICTED LEVEL 2

Defendant.

**BRIEF IN SUPPORT OF GOVERNMENT’S MOTION TO RESTRICT DOCUMENTS
[86 & 87]**

The United States of America hereby files this Brief in Support of the Motion to Restrict access to Exhibit 1 in response to the Minute Order, Docket No. 82 regarding the Defendant’s Motion for a Sentence Reduction, [ECF 82], as a Level 2 restriction, viewable by the Court and Selected Filing party only. In support thereof, the undersigned states as follows:

The Court has authority to restrict documents upon a showing of compelling reasons. *See* D.C.COLO.LCrR 47.1(A). Restriction of this exhibit is appropriate under D.C.Colo.LCrR 47.1 for the following reasons and as further outlined below: 1) the interests stated herein outweigh the presumption of public access; 2) the exhibit contains the defendant’s medical records, which should not be disclosed to the public and other parties to this case. 3) only restricted access will adequately protect the interests in question.

Accordingly, the government respectfully moves to restrict access to its notice [ECF 86 & 87], any order revealing the contents of that document, and the brief filed in support of this motion.

Respectfully submitted this 17th day of September 2024.

MATTHEW T. KIRSCH
Acting United States Attorney

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CERTIFICATE OF SERVICE

I hereby certify that on this 17th day of September 2024, I electronically filed the foregoing **BRIEF IN SUPPORT OF GOVERNMENT’S MOTION TO RESTRICT DOCUMENTS [86 & 87]** with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all parties of record. Additionally, a copy of this pleading will be mailed to the defendant, who appears pro se, at:

Dejane Reaniece Lattany
#51090-510
FMC Carswell: Federal Medical Center
P.O. Box 27137,
Fort Worth, TX 76127

By: s/ Deana Ambrosen
Legal Assistant
United States Attorney’ Office