IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA	*	
	*	
v.	*	**CRIMINAL NO. JRR-22-0248**
	*	
DONNA JONES	*	
	*	
	*	

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MOTION TO FILE EXHIBITS TO THE GOVERNMENT'S OMNIBUS MOTIONS IN *LIMINE* UNDER SEAL

The United States of America, by and through undersigned counsel, hereby files this motion to file its exhibits to the Government's Omnibus Motions in *Limine* (the "Exhibits") under seal. In support of this motion, the government states as follows:

1. The Exhibits contains sensitive information and no reasonable alternative to sealing is available. Specifically, redaction of sensitive portions of the Exhibits would render the documents substantially unreadable and would compromise counsel's ability to convey important information relevant to this case. Additionally, the interests in sealing outweigh the interests of disclosure on the docket. *See Baltimore Sun Co. v. Goetz*, 886 F.2d 60, 63 (4th Cir. 1989) (describing standards for sealing)

2. Counsel will file a hard copy of the Exhibits with the Court (pursuant to Standing Order 2025-04) and intends to serve defense counsel with copies of the Exhibits in compliance with Fed. R. Crim. P. 49(a)(3)(B) or (a)(4).

WHEREFORE, the Government respectfully requests that the Court grant the Government's Motion to File its exhibits to the Government's Omnibus Motions in *Limine* Under Seal.

Respectfully submitted,

Kelly O. Hayes
United States Attorney

/s/
Evelyn Lombardo Cusson
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CERTIFICATE OF SERVICE

I hereby certify that I filed the foregoing with the Court via CM/ECF, which sent a copy to counsel of record.

_____/s_____
Evelyn Lombardo Cusson
Assistant United States Attorney