UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
ORLANDO DIVISION

UNITED STATES OF AMERICA,
Plaintiff,

Case No. 6:22-cr-00001-ACC-GJK

v.

SEALED DOCUMENT

TOMAS ZIUPSNYS,
Defendant.

MOTION FOR LEAVE TO ELECTRONICALLY FILE UNDER SEAL

COMES NOW, the Defendant, **TOMAS ZIUPSNYS**, by and through his undersigned counsel of record, and request that this Honorable Court enter an Order Sealing the Defendant's Supplement to the Defendant' Tomas Ziupsnys's Sentencing Memorandum and Motion for a Downward Variance for the reasons set forth below:

1. Defendant's Sentencing Memorandum and Request for a Downward Variance references information of a sensitive nature and could compromise the Defendant and his family's safety based on information contained therein.

WHEREFORE, counsel for the Defendant respectfully requests that this Court enter an Order Sealing the Defendant's Addendum to the Sentencing Memorandum and Request for a Downward Variance along with Attachments for those reasons stated hereinabove.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on May 10, 2022, I electronically filed the foregoing, with the Clerk of the Court, by using the CM/ECF system, which will send a Notice of Electronic Filing to the following: Assistant United States Attorney(s), Emily Chang, Office of the United States Attorney, 400 W. Washington St., Suite 300, Orlando, FL 32805.

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