

Appendix C

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 08-80736-CIV-MARRA

JANE DOE #1 and JANE DOE #2,

Petitioners,

vs.

UNITED STATES,

Respondent.

MOTION TO SEAL

The United States of America, by and through the undersigned Assistant United States Attorney, hereby moves to seal its Motion to Stay Discovery Pending Ruling upon Respondent's Motion to Dismiss for the following reasons:

1. The Motion contains information regarding proceedings before West Palm Beach Federal Grand Jury 05-02 and West Palm Beach Federal Grand Jury 07-103, which is subject to the secrecy protections of Fed. R. Crim. P. 6.

2. Pursuant to Rule 6(e)(6), "[r]ecords, orders, and subpoenas relating to grand-jury proceedings must be kept under seal to the extent and as long as necessary to prevent the unauthorized disclosure of a matter occurring before a grand jury."

3. On November 7, 2011, the United States moved for permission to disclose limited information from those grand jury proceedings relevant to this litigation. The Court issued an Order allowing such limited disclosure, but required that all pleadings containing such information be filed under seal.

WHEREFORE, the United States respectfully requests that the Motion to Stay Discovery Pending Ruling upon Respondent's Motion to Dismiss be sealed.

DATED: November 7, 2011

Respectfully submitted,

WIFREDO A. FERRER
UNITED STATES ATTORNEY

By:


DEXTER A. LEE

Assistant U.S. Attorney
Fla. Bar No. 0936693
A. MARIE VILLAFANA
99 N.E. 4th Street
Miami, Florida 33132
(305) 961-9320
Fax: (305) 530-7139
E-mail: dexter.lee@usdoj.gov
Attorney for Respondent

CERTIFICATE OF SERVICE

The undersigned hereby certifies and affirms that a copy of the foregoing was served via United States Mail this 7th day of November, 2011, upon Counsel for Petitioners Jane Doe #1 and Jane Doe #2.


DEXTER A. LEE
ASSISTANT U.S. ATTORNEY

SERVICE LIST

Jane Does 1 and 2 v. United States,
Case No. 08-80736-CIV-MARRA/JOHNSON
United States District Court, Southern District of Florida

Brad Edwards, Esq.,
The Law Offices of Brad Edwards &
Associates, LLC
2028 Harrison Street, Suite 202
Hollywood, Florida 33020
(954) 414-8033
Fax: (954) 924-1530

Paul G. Cassell
S.J. Quinney College of Law at the
University of Utah
332 S. 1400 E.
Salt Lake City, Utah 84112
(801) 585-5202
Fax: (801) 585-6833
E-mail: casselp@law.utah.edu
Attorneys for Jane Doe # 1 and Jane Doe # 2