

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
NO. [REDACTED]

UNITED STATES OF AMERICA :
 :
v. : MOTION TO SEAL PROPOSED
[REDACTED] : SPECIAL JURY INSTRUCTIONS
 : AND INCORPORATED BRIEF

NOW COMES the Defendant, by and through counsel, and applies, ex parte, to this Honorable Court to seal Defendant's Proposed Special Jury Instructions and Incorporated Brief submitted in this matter. In support of this motion, the Defendant asserts that his Proposed Special Jury Instructions necessarily contain his theory of defense, related to counsel through the attorney client relationship, and that it would be improper to divulge the Defendant's defense theory and strategy other than to the Court prior to the Defendant's trial.

Respectfully submitted this _____ day of February, 2004.

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