

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

UNITED STATES OF AMERICA :
 :
 v. : MOTION TO SEAL
 [REDACTED] : TRIAL BRIEF
 :

NOW COMES the Defendant, by and through counsel, and applies, ex parte, to this Honorable Court for an order to seal Defendant's Trial Brief submitted in this matter. Undersigned counsel and counsel for Defendant [REDACTED] have conferred with regard to this brief and each are proceeding under the same theory as set forth therein. As a convenience to the Court and to eliminate any repetition, Defendant [REDACTED] will be filing a motion to adopt the Defendant's Trial Brief rather than filing an identical brief. In support of this motion to seal, the defendants assert that their brief necessarily contains their theory of defense and that it would be improper to divulge the that theory and strategy other than to the Court prior to the defendants' trial.

Respectfully submitted this _____ day of February, 2004.

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