## UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MISSOURI

UNITED STATES OF AMERICA,	)
Plaintiff,	)
	) )
V.	)
<defendant's name="">,</defendant's>	)
Defendant.	)

Case No. <CASE NUMBER>

## <u>UNSEALED MOTION FOR PARTIAL SEALING [or, SEALING] PURSUANT TO RULE 13.05</u> (FILED WITHOUT ATTACHMENTS)

1. A sealed memorandum in support of this unsealed motion for partial sealing [or, sealing] is being filed separately in connection with this motion as required by Eastern District of Missouri Local Rule 13.05A(4)(b)(i).

2. Without disclosing the material sought to be kept confidential, the information sought to be filed under seal is [describe the nature of the material the party wishes the Court to seal].

3. The legal grounds in support of this request [articulate the specific legal grounds (*i.e.*, statute, case law, or other authority) that support the request].

4. The duration of this request is [indefinite] [temporary and should last until \_\_\_/\_\_\_] because [describe the reason for the duration requested].

5. Opposing counsel [objects, or does not object] to this unsealed motion for partial sealing [or, sealing]. [(Note: Even if opposing counsel does not object to the request, the requesting party must articulate the legal grounds supporting the request in paragraph three.)]

**Respectfully Submitted:** 

<SIGNATURE BLOCK>

Signature above is also certification that a true and correct copy of the above and foregoing document has been filed this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_, with the Clerk of the Court to be served by operation of the Court's electronic filing system upon the Office of the United States Attorney, [111 South 10<sup>th</sup> Street, St. Louis, MO 63102.] [555 Independence Street, Cape Girardeau, MO 63703.]

## UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MISSOURI

UNITED STATES OF AMERICA, Plaintiff,	)
	)
V.	)
	)
<defendant's name="">, Defendant.</defendant's>	)

Case No. <CASE NUMBER>

# SEALED MEMORANDUM IN SUPPORT OF UNSEALED MOTION FOR PARTIAL SEALING [or, SEALING]

1. The undersigned filed an unsealed motion for partial sealing [or, sealing] separate from this Memorandum, as required by Eastern District of Missouri Local Rule 13.05A(4)(a). (Doc. #\_\_\_\_)

2. The information that needs to be [redacted, or sealed] is [describe the substance of the material the party would like the Court to (redact, or seal) **and** the factual reasons that support the request to redact or seal].

3. The legal justification for partial sealing [or, sealing] is [articulate the specific legal grounds (*i.e.*, statute, case law, or other authority) that support the sealing request]. [A sworn statement/ affidavit/or other document, marked as Exhibit #\_\_\_\_, is attached to further support the request.]

4. [Redacting the information or material identified **will** protect the confidential nature of the material the party seeks to seal.] [The need for sealing the information or material identified **cannot** be met by redacting, because (state the specific reasons why redacting targeted portions of the item will not protect the confidential material that has been identified).] (Note: Memoranda should be drafted in a manner to limit redactions as sealing in the entirety should be rare.)

5. The information sought to be sealed [was produced by a non-party<sup>1</sup> and the non-party *does not* object to the sealing] [was produced by a non-party and the non-party *does* object to the sealing] [was not produced by a non-party].

6. Notice of sealing [has been given to the non-party] [has not been given to the non-party] [is inapplicable because the information was not obtained from a non-party].

7. [Redacting is feasible] and [a redacted copy is attached as Exhibit #\_\_\_] [.] [will be filed within 3 business days] [.] [Redacting is not feasible in the permitted timeframe because (provide specific reasons why it can't be completed in time)].

<sup>&</sup>lt;sup>1</sup> A producing non-party is a person or organization that is not a named party in the case but is the source of material a party seeks to file under seal.

8. A complete and unredacted copy of the proposed sealed document is attached, as Exhibit #\_\_\_\_, to this sealed memorandum as required by Eastern District of Missouri Local Rule 13.05A(4)(b)(ii).

**Respectfully Submitted:** 

<SIGNATURE BLOCK>

Signature above is also certification that a true and correct copy of the above and foregoing document has been filed this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_, with the Clerk of the Court to be served by operation of the Court's electronic filing system upon the Office of the United States Attorney, [111 South 10<sup>th</sup> Street, St. Louis, MO 63102.] [555 Independence Street, Cape Girardeau, MO 63703.]

### UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MISSOURI

UNITED STATES OF AMERICA,	)
Plaintiff,	)
	)
	)
V.	)
	)
	)
<defendant's name="">,</defendant's>	)
Defendant.	)

Case No. <CASE NUMBER>

### <u>FILING IN THE PUBLIC RECORD OF REDACTED COPY OF SEALED DOCUMENT</u> (WITHIN THREE DAYS OF FILING MOTION FOR PARTIAL SEALING)

1. On \_\_\_/\_\_\_, undersigned filed an Unsealed Motion for Partial Sealing and a Sealed Memorandum in Support.

2. Less than three business days have passed since that filing.

3. As required by Eastern District of Missouri Local Rule 13.05A(4)(c)(i), the attached redacted copy of the sealed document is filed for docketing in the public record.

Respectfully Submitted:

<SIGNATURE BLOCK>

Signature above is also certification that a true and correct copy of the above and foregoing document has been filed this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_, with the Clerk of the Court to be served by operation of the Court's electronic filing system upon the Office of the United States Attorney, [111 South 10<sup>th</sup> Street, St. Louis, MO 63102.] [555 Independence Street, Cape Girardeau, MO 63703.]