

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

IN RE: GRAND JURY SUBPOENAS
DUCES TECUM NUMBERS FGJ 07-103 (WPB)
OLY-64 AND OLY-64

MOTION TO FILE DOCUMENTS UNDER SEAL

The United States of America, by and through the undersigned Assistant United States Attorney, hereby moves to seal this Motion, the United States' Motion of Jeffrey Epstein to Intervene and to Quash Grand Jury Subpoenas and Cross-Motion to Compel, the United States' Motion for Permission to File *Ex Parte* Affidavits, the Order on the United States' Motion for Permission to File *Ex Parte* Affidavits, the United States' Unopposed Motion for Permission to File Oversized Response to Motion of Jeffrey Epstein to Intervene and to Quash Grand Jury Subpoenas and Cross-Motion to Compel, Ex Parte Declaration Number One in Support of United States' Response to Motion to Quash Subpoenas, the Declaration of [REDACTED] and the Ex Parte Declaration Number Two in Support of United States' Response to Motion to Quash Subpoenas for the following reasons:

1. The attached documents contain information relating to an ongoing grand jury investigation; thus, pursuant to Fed. R. Crim. P. 6(e)(6), all records and orders related to the 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 the grand jury.

2. Public disclosure of this matter would jeopardize the criminal investigation, notify potential subjects and/or targets and undermine the public interest and the function of the grand jury.

WHEREFORE, the United States respectfully requests that the aforementioned documents be sealed.

Respectfully submitted,
R. ALEXANDER ACOSTA
UNITED STATES ATTORNEY

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on July ____, 2007, the foregoing document will be served via Federal Express on Attorney William Richey and will be served by hand delivery on Attorney Roy Black. This document was not filed using CM/ECF because it is being filed under seal.

Assistant U.S. Attorney

SERVICE LIST

In re Federal Grand Jury Subpoenas No. OLY-63 and OLY-64
United States District Court, Southern District of Florida

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