

# Appendix E

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.

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**MOTION TO SEAL**

The United States of America, by and through the undersigned Assistant United States Attorney, hereby moves to seal its Reply in Support of Its Motion to Dismiss for Lack of Subject Matter Jurisdiction 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 its Reply in Support of Its Motion to Dismiss for Lack of Subject Matter Jurisdiction be sealed.

DATED: January 26, 2012

Respectfully submitted,

WIFREDO A. FERRER  
UNITED STATES ATTORNEY

By:



500 S. Australian Ave, Suite 400  
West Palm Beach, FL 33401

Fax: [Redacted]  
E-mail: [Redacted]  
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 26th day of January, 2012, upon Counsel for Petitioners Jane Doe #1 and Jane Doe #2.



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

**Bradley Edwards, Esq.**

Farmer Jaffe Weissing Edwards Fistos  
Lehrman  
425 N Andrews Ave Ste 2  
Fort Lauderdale, FL 33301-3268

[REDACTED]

Fax: [REDACTED]

[Service via U.S. Mail]

**Paul G. Cassell**

S.J. Quinney College of Law at the  
University of Utah  
332 S. 1400 E.  
Salt Lake City, Utah 84112

[REDACTED]

Fax: [REDACTED]

E-mail: [REDACTED]

[Service via U.S. Mail]

**Attorneys for Jane Doe # 1 and Jane Doe #**

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