

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

**Case No. 9:08-80736-Civ-Marra/Johnson**

**JANE DOE #1 and JANE DOE #2**

**v.**

**UNITED STATES**  
\_\_\_\_\_ /

**JANE DOE NO. 1 AND JANE DOE NO. 2'S MOTION TO TEMPORARILY SEAL  
THEIR MOTION TO COMPEL ANSWERS TO SUPPLEMENTAL REQUESTS FOR  
ADMISSIONS AND REQUESTS FOR PRODUCTION**

COME NOW Jane Doe No. 1 and Jane Doe No. 2 (the "victims"), by and through undersigned counsel, to file this motion to temporarily seal their Motion to Compel Answers to Supplemental Requests for Admission and Requests for Production (hereinafter referred to as the "Motion to Compel").

As indicated in their Motion to Compel, see page 2 at n. 1, the victims have attempted to secure the documents in question through voluntary production, by requests to both the Government and an identified non-party. Those efforts have been unsuccessful, prompting the need for a motion to the court. The victims are aware that a non-party to this litigation may attempt to intervene and argue that their motion is not proper should not be a part of the public court file. The victims, of course, take the view that their Motion to Compel is proper and is the appropriate procedural method for obtaining this information that clearly meets the threshold of being reasonably calculated to lead to the discovery of admissible evidence. In light of local rule 5.4(a) which indicates that Court filings are generally a matter of public record, the victims understand that this motion would not typically be sealed. However, in order to give the identified non-party

an opportunity to try to raise any arguments he might wish to present to the Court on this issue, the victims request that their motion be placed under a temporary seal.

**WHEREFORE**, the victims request that their Motion to Compel be placed under seal for ten days or until the Court has ruled on any motion by any non-party to seal the motion, whichever is longer.

DATED: December 28, 2015

Respectfully Submitted,

/s/ Bradley J. Edwards  
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\*This daytime business address is provided for identification and correspondence purposes only and is not intended to imply institutional endorsement by the University of Utah

**CERTIFICATE OF SERVICE**

I certify that the foregoing document was served on December 28, 2015, on the following using the Court's CM/ECF system or, for non-parties, by separate email service:

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