FILED UNDER SEAL

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA	:
	:
v.	:
GRADY DOUGLAS OWENS,	:
Defendant.	:

Case No. 21-cr-00286-BAH

MOTION TO SEAL

The Defendant, Grady Douglas Owens, by and through undersigned counsel, respectfully moves for an order of this Court placing under the Court's seal Metropolitan Police Department (MPD) Officer C.B.'s medical records, the alleged victim in this case. In support of this Motion, Defendant states as follows:

1. This proposed sealed filing contains Officer C.B.'s sensitive medical information and confidential MPD documents.

2. No reasonable alternatives to sealing are available. Redaction of sensitive portions of these documents would render the submission substantially unreadable and would compromise counsel's ability to convey important information to the Court.

3. These medical records were provided by Government Counsel who will be notified of this sealed filing.

WHEREFORE, Defendant respectfully requests that these medical records and related MPD documents be placed under the Court's seal.

Respectfully Submitted,

/s/

Pat Munroe Woodward, Esq. D.C. Bar No. 436662 1783 Forest Drive, No. 330 Annapolis, MD 21401 Phone: 202-246-4679 Fax: 410-216-9812 patmwoodwardjr@gmail.com

CERTIFICATE OF SERVICE

I hereby certify that on this 10th day of May, 2021, I electronically filed the foregoing Motion to Seal and proposed Order with the Clerk of Court using the CM / ECF system, emailed the sealed filing to <u>dcd_cmecf_cr@dcd.uscourts.gov</u>, and notified Assistant United States Attorney Jennifer M. Rozzoni of this sealed filing by email.

> /s/ Pat Munroe Woodward, Esq.

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UNITED STATES OF AMERICA	:
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ORDER

Upon consideration of the motion filed by Defendant to seal the medical records of Metropolitan Police Department (MPD) Officer C.B. and related confidential MPD documents in this case, the Court having considered the specific factually-based reasons advanced for the requested sealing and having determined that there are no reasonable alternatives to sealing that would provide sufficient protection, it is this _____ day of May, 2021, by the United States District Court for the District of Columbia,

ORDERED, that the Defendant's Motion to Seal be and the same hereby is

GRANTED; and it is further

ORDERED, that the Defendant's filing of medical records and MPD documents be and the same are hereby **PLACED UNDER SEAL** of the Court.

Beryl A. Howell Chief Judge