

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA :
 :
 v. : Case No. 21-cr-537-JMC-3
 :
 PAUL RUSSELL JOHNSON *et al.*, :
 :

PAUL RUSSELL JOHNSON'S MOTION FOR LEAVE TO FILE UNDER SEAL

Paul Russell Johnson, through counsel, moves this Court for leave to file under seal Exhibit 19, which Mr. Johnson introduced at the March 24, 2022 suppression hearing. Exhibit 19 is a certified copy of an unredacted Geographic Information System map of Mr. Johnson's property from the New Kent County Land Records Office, a redacted version of which was filed as an Exhibit 1 to Mr. Johnson's Reply In Support of Paul Russell Johnson's Motion to Suppress Electronic Evidence or, In the Alternative, to Appoint a Special Master (ECF No. 97-1). Exhibit 19 references and includes photographs of Mr. Johnson's home address. The government does not oppose Mr. Johnson's request to seal this Exhibit. An unredacted version of this Exhibit was admitted at the March 24, 2022 Suppression Hearing.

Accordingly, Mr. Johnson respectfully requests that he be permitted to file the Exhibit under seal.

Dated: March 25, 2022

Respectfully submitted,

/s/

Kobie Flowers (Bar No. 991403)
BROWN GOLDSTEIN & LEVY, LLP
1717 K Street, NW, Suite 900
Washington, DC 20006
Tel: (202) 742-5969
Fax: (202) 742-5948
kflowers@browngold.com

Monica Basche (Bar No. MD0105)
BROWN GOLDSTEIN & LEVY, LLP
120 E. Baltimore Street, Suite 2500
Baltimore, Maryland 21202
Tel: (410) 962-1030
Fax: (410) 385-0869
mbasche@browngold.com

Counsel for Paul Russell Johnson

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of this Motion was served on all counsel of record via email.

Date: March 25, 2022

/s/ Kobie Flowers
Kobie Flowers