

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

**UNITED STATES OF AMERICA,**            )  
  )  
  )  
**V.**    )  
  )  
**PHILLIP BROMLEY,**                            )  
  )  
**DEFENDANT.**                                    )

**CASE NO. 21-000250-001**

**MOTION FOR LEAVE TO FILE A DOCUMENT UNDER SEAL**

COMES NOW the Defendant, Phillip Bromley, by and through his counsel, and respectfully moves this Honorable Court for leave to file the response to the Government’s sentencing memorandum under seal, and as grounds therefore states the following:

1. Undersigned Counsel has attached a redacted copy of the Defendant’s response to the Government’s sentencing memorandum in the above styled case;
2. Mr. Bromley’s unredacted sentencing memorandum contains sensitive background and other information that does not need to be publicly displayed.
3. Counsel for the Defendant has served AUSA William Dreher and AUSA Christopher Cook with a copy of the unredacted sentencing memorandum via email.

WHEREFORE, PREMISES CONSIDERED, we respectfully request this Honorable Court to allow Counsel for the Defendant to file said sentencing memorandum under seal.

RESPECTFULLY SUBMITTED,

*l/s Richard S. Jaffe*

RICHARD S. JAFFE

*l/s Michael W. Whisonant, Jr.*

\_\_\_\_\_  
MICHAEL W. WHISONANT, JR.

OF COUNSEL:

JAFFE, HANLE, WHISONANT & KNIGHT P.C.

2320 ARLINGTON AVENUE SOUTH

BIRMINGHAM, AL 35205

205-930-9800

**CERTIFICATE OF SERVICE**

I do hereby certify that I have on this the 3<sup>rd</sup> day of May 2022, served a copy of the foregoing by electronic filing to all parties involved.

*l/s Michael W. Whisonant, Jr.*

\_\_\_\_\_  
MICHAEL W. WHISONANT, JR