## UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

:

V.

Case No. 21-cr-398-BAH

JAMES MCGREW,

.

Defendant.

## GOVERNMENT'S MOTION TO SEAL MEDICAL RECORDS

The United States of America respectfully requests to submit and seal an excerpt from the defendant's medical records from Department of Veterans Affairs. On January 15, 2023, the defendant filed under seal the "Professional Forensic Neuropsychological Consultation" and "Executive Summary" of Douglas F. Watt, Ph.D. Within the documents filed, Dr. Watt referred to specific pages of the defendant's 3,152-page medical record.

To provide the Court context for Dr. Watt's conclusions, which both parties will likely refer to at sentencing, the government would request to submit the pages of the medical records which appear to be the basis of Dr. Watt's conclusions under seal. The government expects that it will be no more than 10 to 15 pages.

Sincerely,

MATTHEW GRAVES United States Attorney By: /s/ Lucy Sun

Lucy Sun

Assistant United States Attorney Detailee – Federal Major Crimes United States Attorney's Office for the District of Columbia Telephone No. (617) 590-9468

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## CERTIFICATE OF SERVICE

I, Lucy Sun, hereby certify that on this day, January 18, 2023, I caused a copy of the foregoing document to be served on the defendant's attorneys via ECF.

By: /s/ Lucy Sun Lucy Sun