

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

UNITED STATES OF AMERICA

v.

CLIFFORD MACKRELL,

Defendant.

Crim. Action No. 1:21CR276

**MOTION FOR LEAVE TO FILE SENTENCING MEMORANDUM WITH
REDACTION**

Clifford Mackrell, through undersigned counsel, respectfully moves this Court for permission file limited portions of the defense Memorandum in Aid of Sentencing under seal pursuant to Local Criminal Rule 5.1(h). In support of this Motion, counsel states:

1. Mr. Mackrell will be before for sentencing on March 5, 2024.
2. Defense counsel will file Mr. Mackrell's Sentencing Memorandum on February 14, 2024, consistent with the Court's scheduling order.
3. Counsel seeks leave to file the Memorandum with limited redactions. Counsel will provide chambers and the government with a copy without redaction.
4. The Court has the inherent power to seal materials submitted to it. *See United States v. Hubbard*, 650 F.2d 293 (D.C. Cir. 1980); *United States v. Wuagneux*, 683 F.2d 1343, 1351 (11th Cir. 1982); *Times Mirror Company v. United States*, 873 F.2d 1210 (9th Cir. 1989); *In re Knight Pub. Co.*, 743 F.2d 231, 235 (4th

Cir. 1984) (the trial court has supervisory power over its own records and may, in its discretion, seal documents if the public's right of access is outweighed by competing interests).

5. Because the redacted portions contain sensitive information, counsel moves to seal those portions.

Respectfully submitted,

A. J. Kramer
Federal Public Defender

_____/s/_____
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