

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

UNITED STATES OF AMERICA)
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BRADLEY RUSKTALES,)
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Defendant.)

Case No. 1:21-cr-41-5 (CJN)

**DEFENDANT’S MOTION FOR LEAVE TO FILE SEALED
AND REDACTED MATERIAL, AND TO LATE FILE
DEFENDANT’S MEMORANDUM IN AID OF SENTENCING**

Defendant Bradley Rukstales, by and through undersigned counsel, respectfully moves this Court for an order to seal portions of Defendant’s Memorandum in Aid of Sentencing and Exhibits A and M to the same. The sealing requested by Mr. Rukstales is necessary to ensure the privacy of this sensitive and related health information.

As well, counsel seeks to late file the Memorandum by five (5) hours; counsel had an urgent childcare issue that delayed the filing. Counsel submits that the government is not prejudiced by the delay.

Wherefore, for the foregoing reasons, Bradley Rukstales respectfully requests that this Court grant his Motion and order that:

- 1) a portion of Defendant’s Memorandum in Aid of Sentencing and Exhibits A and M to the same be sealed and entry on the public docket of the material contained therein be delayed until further order of this Court; and
- 2) an unsealed, redacted version of Defendant’s Memorandum in Aid of Sentencing shall be filed in the public record until further order of this Court; and
- 3) the request the late file Defendant’s Memorandum in Aid of Sentencing is granted.

Respectfully submitted,

_____/s/_____
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 4th day of November 2021, I caused a true and correct copy of the foregoing Defendant's Motion to be delivered via ECF to Assistant United States Attorneys Seth Meinerio and Susan Lehr, United States Attorney's Office, 555 4th Street, NW, Rm. 4840, Washington, D.C. 20530.

_____/s/_____
David Benowitz