

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

UNITED STATES OF AMERICA	)	Docket No. 1:21-cr-00386
	)	
	)	
v.	)	ELECTRONICALLY FILED
	)	
PAULINE BAUER,	)	The Honorable Trevor N. McFadden
	)	
Defendant.	)	

**MOTION FOR LEAVE TO FILE DOCUMENTS UNDER SEAL**

AND NOW, to-wit, comes Defendant, Pauline Bauer (hereinafter “Ms. Bauer”), by and through her attorney, Komron Jon Maknoon, Esquire, and respectfully files the within Motion for Leave to File Documents Under Seal and, in support thereof, avers as follows:

1. Undersigned counsel intends to file an Emergency Supplement to Motion for Reconsideration of Detention Order Pursuant to 18 U.S.C. § 3142(f), which will include detailed information pertaining to Ms. Bauer’s recent health and medical changes since June 27, 2022, when Ms. Bauer filed a Motion for Reconsideration of Detention Order Pursuant to 18 U.S.C. § 3142(f) (*See* ECF Doc. No. 137).
2. Medical information is safeguarded and protected from disclosure by the Health Insurance Portability and Accountability Act of 1996 (hereinafter “HIPAA”).
3. Sealing is necessary for the Emergency Supplement to Motion for Reconsideration of Detention Order Pursuant to 18 U.S.C. § 3142(f) due to the nature of the included information and strict privacy and security provisions under HIPAA.
4. There are no means other than sealing available or satisfactory in the present matter.

**WHEREFORE**, undersigned counsel respectfully requests this Honorable Court permit leave to file Emergency Supplement to Motion for Reconsideration of Detention Order Pursuant

to 18 U.S.C. § 3142(f) under seal and respectfully requests that no redacted version need be filed in addition to the sealed motion.

Respectfully submitted,

*s/ Komron Jon Maknoon*  
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