

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,)
)
)
V.) **CASE NO. 21-000250-001**
)
PHILLIP BROMLEY,)
)
)
)
)
)
)
DEFENDANT.)

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 sentencing memorandum under seal, and as grounds therefore states the following:

1. Undersigned Counsel has attached a redacted copy of the 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.

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 26th day of April 2022, served a copy of the foregoing by electronic filing to all parties involved.

l/s Michael W. Whisonant, Jr.
MICHAEL W. WHISONANT, JR