

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

UNITED STATES OF AMERICA	:	
	:	
v.	:	Case No: 21-CR-403 (RC)
	:	
NICOLE PRADO,	:	
Defendant.	:	

MOTION TO SEAL DEFENSE VIDEO EXHIBITS 15-26

Comes now, Defendant, by counsel, and respectfully moves this Court, pursuant to the Protective Order (ECF 15) entered in this case on June 22, 2021, to issue an order sealing defendant’s video sentencing exhibits 14 - 26¹. Earlier today, Defendant filed “Defendant’s Notice of Filing Exhibits” (ECF 43). The notice references fifteen video exhibits. Fourteen of the videos (Defense Exhibits 14-26) are clips from CCTV footage, identified as “Highly Sensitive” by the government. Pursuant to paragraph 4(d) of the the Protective Order, “Sensitive” and “Highly Sensitive” materials are to be filed under seal.

Accordingly, Defendant moves this Court for an Order placing Defense Exhibits 14-26 under seal.

¹ Undersigned counsel inadvertently labeled two different videos with the same exhibit number (Defense Exhibit 22). Hereinafter, those exhibits will be referred to as Defense Exhibit 22A and Defense Exhibit 22B.

Respectfully submitted,

_____/s/
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CERTIFICATE OF SERVICE

I hereby certify that on the 3rd day of February, 2022, I will electronically file the foregoing Motion with the Clerk of Court using the CM/ECF system, which will then send a notification of said filing (NEF) to counsel of record.

_____/s/
Joan Robin