

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

UNITED STATES OF AMERICA,

v.

SAMUEL LAZAR,

Defendant.

Case No: 21-cr-525-ABJ

THE PRESS COALITION'S MOTION TO UNSEAL

Pursuant to Local Criminal Rule 57.6, the Press Coalition¹ respectfully requests that the Court unseal and place on the public docket all records currently not available related to the plea and sentencing of Defendant Samuel Lazar. This motion seeks access to any sealed or otherwise undocketed judicial records related to Lazar's sentencing, including but not limited to: any plea or change of plea made by Lazar; any sentencing by the Court; the transcript of any sentencing hearing; any memoranda or other filings made in connection with a sentencing hearing; any related motion to seal, response thereto; and any sealing order.

These filings (together, the "Sealed Records") are all subject to the First Amendment and common law rights of access. The public docket provides no explanation as to why, despite the strong presumption of transparency in this Circuit, these judicial records are not available to the

¹ Members of the Press Coalition are Cable News Network, Inc., American Broadcasting Companies, Inc. d/b/a ABC News, The Associated Press, CBS Broadcasting, Inc. o/b/o CBS News, Dow Jones & Company, Inc., publisher of The Wall Street Journal, The E.W. Scripps Company, Gannett Co., Inc., Gray Media Group, Inc. Los Angeles Times Communications LLC, publisher of The Los Angeles Times, National Public Radio, Inc., NBCUniversal Media, LLC d/b/a NBC News, The New York Times Company, POLITICO LLC, Pro Publica, Inc., Tegna, Inc., and WP Company LLC, d/b/a The Washington Post.

public. The Court should therefore grant the Press Coalition's motion for access to the Sealed Records.

Dated: April __, 2023

Respectfully submitted,

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