

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

UNITED STATES OF AMERICA :

v.

GABRIEL CHASE,

Defendant.

:
:
:
:

CASE NO.: 23-cr-00018(CKK)

REQUEST TO SEAL DOCUMENT *NUNC PRO TUNC*

COMES NOW, **THOMAS L. EDWARDS**, attorney for **GABRIEL CHASE**, and respectfully request that Defendant’s Memorandum in Aid of Sentencing filed on Friday, June 23, 2023 be sealed *nunc pro tunc*. As grounds for this motion undersigned counsel states as follows:

1. Undersigned counsel, Thomas L. Edwards, has represented Defendant, Gabriel Chase, throughout these proceedings.
2. Counsel timely filed Defendant’s Memorandum in Aid of Sentencing on Friday, June 23, 2023 and intended that it be filed under seal. Miscommunication resulted in the document being filed directly with this Court without the accompanying request that it be filed under seal.
3. Assistant United State Attorney, Joseph Huynh, in an email correspondence agrees with the relief requested herein.

WHEREFORE, undersigned counsel respectfully requests that this Honorable Court Order that Defendant’s Memorandum in Aid of Sentencing be filed under seal, *nunc pro tunc* to the original filing date, Friday, June 23, 2023.

I HEARBY CERTIFY that a true and correct copy of the foregoing has been furnished to Assistant United States Attorney, **Joseph H. Huynh**, via **CMECF** this 27th day of June, 2023.

Respectfully Submitted,

**Thomas L. Edwards, P.A.
& Christopher J. Jones
Attorneys at Law**

/s/ Thomas L. Edwards

THOMAS L. EDWARDS
Florida Bar Number: 0735035
4545 NW 8th Avenue
Gainesville, FL 32605
352-377-7800 (Telephone)
tome@lawfl.net
brandenw@lawfl.net