UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA	**:**	
v.	**:**	**Case No. 21-cr-537-JMC-3**
PAUL RUSSELL JOHNSON *et al.*,	**:**	
	:	

PAUL RUSSELL JOHNSON'S MOTION FOR LEAVE TO FILE UNDER SEAL

Paul Russell Johnson, through counsel, moves this Court for leave to file under seal the two Exhibits, which Mr. Johnson intends to introduce at the upcoming March 17, 2022 suppression hearing. Exhibit 1 is an unredacted copy of the Geographic Information System map of Mr. Johnson's property from the New Kent County Land Records Office, a redacted version of which was filed as an Exhibit 1 to Mr. Johnson's Reply In Support of Paul Russell Johnson's Motion to Suppress Electronic Evidence or, In the Alternative, to Appoint a Special Master (ECF No. 97-1). Exhibit 2 is two pieces of mail addressed to Mr. Johnson.

The Exhibits reference Mr. Johnson's home address, and Exhibit 1 includes a photograph of Mr. Johnson's home address. Mr. Johnson intends to introduce these Exhibits into evidence at the suppression hearing. The government does not oppose Mr. Johnson's request to seal these Exhibits.

Accordingly, Mr. Johnson respectfully requests that he be permitted to file the Exhibits under seal.

Dated: March 16, 2022

Respectfully submitted,

/s/

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of this Motion was served on all counsel of record via email.

Date: March 16, 2022

/s/ Kobie Flowers
Kobie Flowers