

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION

UNITED STATES OF AMERICA,
Plaintiff,

Case No. 8:21-CR-348-T-SCB-SPF

JEREMY BROWN,
Defendant.

DEFENDANT'S MOTION TO FILE MOTION TO SUPPRESS
EXHIBITS UNDER SEAL

Defendant, Jeremy Brown, pursuant to Middle District of Florida Local Rule 1.11, respectfully moves for entry of an order granting undersigned counsel to file Motion to Suppress Exhibits 1 - 5 under seal. These documents contain sensitive and confidential information regarding privileged discovery pertaining to a protective order of discovery. The grounds supporting this motion are set forth in the following Memorandum.

MEMORANDUM

Defendant has filed a Motion to Suppress. The motion contains information not to be disclosed to the general public.

Good cause for sealing exists where “[a] party’s privacy ... interest in information ... overcomes the interest of the public in accessing the information.” *Romero v. Drummond Co., Inc.*, 480 F.3d 1234, 1245 (11th Cir. 2007). Good cause exists for the Court to allow this document to be filed under seal.

CONCLUSION

For these reasons, Mr. Brown respectfully requests this Court enter an order granting him to file Motion to Suppress exhibits 1 - 5 under seal.

I HEREBY CERTIFY that a copy of the foregoing motion has been filed with the Clerk of Court, this 17th day of March 2022.

Respectfully submitted,

s/William Sansone
WILLIAM SANSONE, ESQUIRE
Sansone Law, P.A.
609 West De Leon Street
Tampa, FL 33606
Telephone: (813) 361-0874
Facsimile: (813) 251-1808
Email: sansonew@gmail.com
Florida Bar # 781231