

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA

Court File 22-CR-00048-ECT-ECW

Plaintiff,

vs.

**DEFENDANTS' MEMORANDUM IN
SUPPORT OF THEIR MOTION TO
FILE DOCUMENTS UNDER SEAL**

STEVEN DORNSBACH; KAMIDA,
INC.,

Defendants.

Defendants Steven Dornsbach and Kamida, Inc., (“Defendants”), through counsel, pursuant to District of Minnesota Rules of Court, LR 49.1(d), respectfully submit this memorandum in support of their Motion to Seal the following documents, which were filed temporarily under seal in this matter:

1. Defendants’ Memorandum of Law in Support of Motion to Order Government to Comply with Fed. R. Crim. P. 16 (Dkt. No. 48);
2. Declaration of Katherine Noye in Support of Motion to Order Government to Comply with Fed. R. Crim. P. 16 (Dkt. No. 49); and
3. Exhibits 1-112 to the Declaration of Katherine Noye in Support of Motion to Order Government to Comply with Fed. R. Crim. P. 16 (Dkt. Nos. 49-1, 49-2, 49-3).

These documents were produced in the above-captioned matter or reference information produced in this matter, and, pursuant to the parties’ Protective Order filed on April 12, 2022, are defined as “Protected Material.” (Dkt. No. 20 ¶ 1.) “Protected

Material” is defined in the Protective Order to “include[] all information produced by the parties in this case, except matters of public record, the defendants’ own statements, criminal history information, and expert reports.” (*Id.*) Additionally, the Protective Order states that “Protected Material [to] be held in strict confidentiality by all parties and counsel to this matter and may be used solely for purposes of this litigation.” (*Id.*) “Any filings with the Court that contain Protected Material...if not redacted, then [shall be] filed under seal in accordance with the Court’s sealing rules and applicable filing procedures.” (Dkt. No. 20 ¶ 7.).

A redacted version of the foregoing documents will not be submitted to the Court unless the Court requests redacted versions of the same. Defendants propose these documents remain sealed until the conclusion of this case.

For these reasons, Defendants respectfully request the Court grant the Motion to File Documents Under Seal.

Dated: May 18, 2022

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