

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 22-MJ-8332-BER



IN RE SEALED SEARCH WARRANT

FILED UNDER SEAL

MOTION TO SEAL NOTICE OF FILING

The United States of America moves the Court to place under seal, until further order of the Court, the Notice of Filing of Redacted Documents, and the attachment to that notice, filed on August 11, 2022. In support of the Motion, the government states:

1. Courts have inherent power to control access to papers filed with the courts. *Nixon v. Warner Communications, Inc.*, 435 U.S. 589, 598 (1978). Courts have traditionally been “highly deferential to the government’s determination that a given investigation requires secrecy and that warrant materials be kept under seal.” *Times Mirror Co. v. United States*, 873 F.2d 1210 (9th Cir. 1989). Therefore, courts have routinely granted government requests to seal warrant materials where there is a need for secrecy. *See Washington Post v. Robinson*, 935 F.2d 282, 289 (D.C. Cir. 1991).

2. The Court previously granted the government’s motion to seal the search warrant signed on August 5, 2022, and materials associated with that warrant (DE1). The document filed with the government’s Notice consists of the search warrant signed and approved by the Court on August 5, 2022, including Attachments A and B, and the redacted Property Receipt listing items seized pursuant to the search, filed with the Court on August 11, 2022. Because the unredacted original versions of these documents are subject to the

Court's earlier order, the government respectfully requests that the Court seal the Notice and attachment.

3. In addition, the government requests that the sealing Order permit disclosure of the Notice and its attachment to counsel for former President Donald J. Trump, who may seek to intervene in pending litigation concerning the unsealing of these materials.

CONCLUSION

WHEREFORE, for these reasons, the United States of America respectfully requests that the Court issue an Order sealing (except to the limited extent specified herein) the Notice of Filing of Redacted Documents and its attachment.

Dated: August 11, 2022

Respectfully submitted,



JUAN ANTONIO GONZALEZ
UNITED STATES ATTORNEY
Florida Bar No. 897388
99 NE 4th Street, 8th Floor
Miami, Fl 33132
Tel: 305-961-9001
Email: juan.antonio.gonzalez@usdoj.gov