

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

Defendant(s).

Case No.

APPLICATION FOR SEALING  
PURSUANT TO CRIM. L.R. 56-1(c);  
DECLARATION IN SUPPORT;  
PROPOSED ORDER

Use this model application to seek sealing of material in a criminal case. Once your form is filled out, click the button, "Finalize this document for filing", and then e-file the PDF using *Criminal Motions - Administrative Motion to File Under Seal*.

Note that some material may be redacted without filing a motion to seal. See, e.g., Crim. L.R. 56-1(b) and Fed. R. Crim P. 5.2 (requiring redaction of an individual's social security number, taxpayer identification number, or birth date, the name of an individual known to be a minor, or a financial account number).

**I. APPLICATION**

Through this application pursuant to Crim. L.R. 56-1(c), the seeks a sealing order in this unsealed criminal case. This application makes the following request(s) for sealing, which are presented with sufficient specificity to allow the Court to determine whether the material is sealable.

**A. What is the material you seek to be sealed?** (List only one item. You will have an option to list additional documents or other material following this justification.)

**B. Are you seeking partial sealing of this material, or sealing of the entirety of the material?**

If partial sealing is sought, specify the page(s), image, or line(s) you seek to be sealed.

**C. Indicate the type of information contained in the material sought to be sealed** (e.g. personal address, medical information, financial information, business, or proprietary information, information regarding minors, or other private information).

**D. Which of the reason(s) contemplated by Crim. L.R. 56-1(a) support(s) sealing?**

Privacy      Safety      Law enforcement interests

**E. If granted, this motion will seal the requested material from the public. Do you also seek to seal this from opposing counsel and party/parties?**

**F. Explain:**

(1) in particular, why this material should be sealed from the public and, if applicable, as to the other parties;

(2) what injury would result if the sealing request is denied;

(3) how the proposed redactions/sealing are no greater than necessary to serve the purposes of the sealing request.

## II. DECLARATION

I, \_\_\_\_\_, declare as follows:

1. I am an attorney duly licensed to practice before this Court, and I represent \_\_\_\_\_ in the above-captioned matter. I make this declaration of my own personal knowledge, and if called as a witness, I could and would testify to the contents hereof.
2. The representations made above in the Application are true and correct to the best of my knowledge and belief.
3. I certify that a less restrictive alternative to sealing the material specifically identified in this application is not available.
4. Unless I am seeking to seal this material from other parties, I am furnishing unredacted copies to the other party/parties. If the judge's standing order so requires, I am furnishing unredacted copies to chambers.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on \_\_\_\_\_, at \_\_\_\_\_.

Respectfully submitted,

Attorney for

**[PROPOSED] SEALING ORDER**

For good cause shown, it is hereby ordered that the documents attached to this application shall be filed as follows:

The following documents shall be filed under seal in their entirety:

The following information shall be partially filed under seal with a redacted version publicly available:

The documents filed under seal shall be sealed from the public from opposing counsel and opposing party/parties. Due to the nature of the information being sealed, it shall not be unsealed without further order of the Court.

**IT IS SO ORDERED.**

Dated:

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United States District Judge/Magistrate Judge