UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

APPLICATION FOR SEARCH WARRANT FOR E-MAIL ACCOUNT [redacted]@GMAIL.COM MAINTAINED ON COMPUTER SERVERS OPERATED BY GOOGLE, INC., HEADQUARTERED AT 1600 AMPHITHEATRE PARKWAY, MOUNTAIN VIEW, CA	)))))))))	Mag. No.: 10-291-M-01

GOVERNMENT'S MOTION TO UNSEAL ENTIRE DOCKET

On September 20, 2010, this Court directed the United States to file a proposed redacted version of this Court's September 20, 2010, Memorandum and Order that could be unsealed with the name of the email account at issue, and any further identifying information, redacted. The United States' complied with this Court's request on September 30, 2010. On November 1, 2011, this Court unsealed its September 20, 2010, Memorandum and Order and ordered that the redacted version be placed on the public record.

Further, on November 4, 2011, the United States requested that the Court unseal in this matter: (1) the application for the search and seizure warrant, (2) the affidavit in support of the application for the search and seizure warrant, (3) the search and seizure warrant, and (4) Attachment A to the search and seizure warrant (hereinafter, collectively, "the search warrant material"). The United States sought the unsealing of the search warrant material to fulfill its discovery obligations in a pending criminal case, United States v. Stephen Jin-Woo Kim, Cr. No. 10-225 (CKK). See F.R.Cr.P. 12(b)(4). To protect the privacy of those involved, the United States requested that dates of birth and email addresses appearing in the search warrant material be redacted before the search warrant material was placed on the public docket. Cf. F.R.Cr. P. 49. On November 7, 2011, this Court granted the government's motion to unseal and ordered that redacted versions of the search warrant material be placed on the public docket.

The United States now respectfully requests that all of the remaining miscellaneous material related to this matter be unsealed and that the entire docket be made available to the public. To protect the privacy of those involved, the United States again requests that dates of birth and email addresses appearing in this material be redacted before it is placed on the public docket. To assist the Court, and consistent with F.R.Cr.P. 49.1(d), the United States attaches hereto redacted versions of the docket material not previously unsealed for entry on the public docket. See Exhibits A through S. Further, the United States requests that it be permitted to produce to the defense in United States v. Stephen Jin-Woo Kim, unredacted versions of this material pursuant to the Rule 16 Protective Order entered in that matter on October 13, 2010. See United States v. Stephen Jin-Woo Kim, Cr. No. 10-225 (CKK), Docket #11. Finally, the United States requests that redacted versions of this motion and the proposed order be placed on the public docket, removing from the caption the name of the email account at issue. Redacted versions of this motion and the proposed order are provided to the Court with this filing. See Exhibits T and U.

WHEREFORE, the United States respectfully requests that this motion to unseal be granted and that the redacted versions of Exhibits A through S be placed on the public docket. Further, the United States requests that it be permitted to produce unredacted versions of this material to the defense in United States v. Stephen Jin-Woo Kim, pursuant to the Rule 16 Protective Order in that matter. Finally, the United States requests that redacted versions of this motion and the proposed order be placed on the public docket, removing from the caption the name of the email account at issue. Proposed redacted versions of this motion and the proposed

order are attached hereto as Exhibits T and U.

Respectfully submitted,

RONALD C. MACHEN JR.
UNITED STATES ATTORNEY
D.C. Bar Number 447-889

By: _____
G. MICHAEL HARVEY
JONATHAN M. MALIS
Assistant United States Attorneys
D.C. Bar Number 447-465 (Harvey)
D.C. Bar Number 454-548 (Malis)
United States Attorney's Office
(202) 252-7810 (Harvey)
(202) 252-7806 (Malis)
Michael.Harvey2@usdoj.gov
Jonathan.M.Malis@usdoj.gov

_____
DEBORAH CURTIS
Department of Justice Trial Attorney
CA Bar Number 172208
(202) 233-2133
Deborah.Curtis@usdoj.gov