

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA,

v.

LESLIE ACOSTA

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: **CRIMINAL NO. 15-548**
: **JUDGE JOEL SLOMSKY**
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**REPLY BRIEF OF THE PENNSYLVANIA NEWSPAPERS IN FURTHER SUPPORT OF
MOTION TO INTERVENE AND UNSEAL**

The intervenors, *LNP Media Group*, the *Philadelphia Inquirer*, and *Spotlight PA* (collectively, the “*Pennsylvania Newspapers*”), do not object to the terms of the Government’s proposed Order to completely unseal Docket Numbers 10, 13, 16, 17, 18, 19, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 32, 33, 36, 37, & 38 and narrowly redact Docket Numbers 34 & 35.

Redactions to Docket Entries 34 & 35 must go no further than necessary to protect the limited interests set forth by the parties—the protection of Grand Jury material subject to Federal Rule of Criminal Procedure 6(e) and of identifying information regarding a minor. In reviewing proposed redactions, the Court serves as “champion of the public interest” safeguarding the right of access. *Midwest Athletics & Sports All. LLC v. Ricob USA, Inc.*, No. 2:19-CV-00514-JDW, 2021 WL 915721, at *1 (E.D. Pa. Mar. 10, 2021) (citing *Binh Hoa Le v. Exeter Fin. Corp.*, No. 20-10377, 2021 WL 838266, at *8 (5th Cir. Mar. 5, 2021)). *The Pennsylvania Newspapers* respectfully request that the Court ensure, “line-by-line,” that the redactions are narrowly tailored to meet the “demanding requirements” for sealing. *Purcell v. Gilead Sciences, Inc.*, 415 F. Supp. 3d 569, 578 (E.D. Pa. 2019).

Finally, the *Pennsylvania Newspapers* disagree with the Government's broad characterization of its general interest regarding the sealing of witness cooperation materials, as articulated in footnote 2 of its Response. The *Pennsylvania Newspapers* agree, however, that such interest is not implicated at this juncture.

Date: April 9, 2021

Respectfully submitted,

CORNELL LAW SCHOOL FIRST AMENDMENT CLINIC¹

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¹ Cornell Law School First Amendment Clinic student Hayden Rutledge assisted in the preparation of this brief.

CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing document was served by email to the following:

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Dated: April 9, 2021

/s/ Paula Knudsen Burke
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