

[REDACTED]; and
AMERICAN CIVIL LIBERTIES UNION,

Plaintiffs,

v.

JOHN ASHCROFT, in his official capacity as
Attorney General of the United States;
ROBERT MUELLER, in his official capacity
as Director of the Federal Bureau of
Investigation; and MARION E. BOWMAN,
in her official capacity as Senior Counsel to
the Federal Bureau of Investigation,

Defendants.

**MOTION FOR LEAVE TO FILE
CASE UNDER SEAL**

04 Civ.

MOTION FOR LEAVE TO FILE CASE UNDER SEAL

Plaintiffs [REDACTED] and American Civil Liberties

Union (ACLU) hereby move for leave to file the above-captioned case under seal.

[REDACTED]

[REDACTED]

[REDACTED] Section 2709 includes a
provision that prohibits any entity served with a National Security Letter from
“disclos[ing] to any person that the Federal Bureau of Investigation has sought or
obtained information or records under this section.” *Id.* § 2709(c). Plaintiffs’ Complaint
alleges that Section 2709(c) is unconstitutional under the First and Fifth Amendments.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] Upon filing

the Complaint, plaintiffs intend to ask the government for [REDACTED]

[REDACTED] If the government agrees to the stipulation, plaintiffs will move immediately to unseal the case. If the government does not agree to the stipulation, plaintiffs may seek preliminary relief in order to unseal the case.

Respectfully submitted,

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