

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

**UNITED STATES OF AMERICA** :

**v.** : **23-CR-321-JEB**

**RAY EPPS, SR** :

**UNOPPOSED MOTION FOR LEAVE TO FILE UNREDACTED VERSIONS OF  
SENTENCING EXHIBITS UNDER SEAL**

Mr. Ray Epps, through undersigned counsel, respectfully moves for leave to file certain sentencing exhibits in redacted form on the public docket and to file sealed, unredacted versions. For safety concerns, counsel has redacted the names and identifying information of persons who authored or are discussed in exhibits of sentencing letters and memoranda. Documented prior harassment and threats provide a specific basis for this request in this case.

The government does not oppose this Motion.

WHEREFORE, Mr. Epps respectfully moves the Court for leave to file the defendant's sentencing unredacted exhibits under seal. A proposed order is attached.

/s/ EDWARD J. UNGVARSKY  
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