

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA)
)
 v.) Docket No.: 23-cr-10159-IT
)
 JACK TEIXEIRA)

**ASSENTED TO MOTION TO FILE DEFENDANT’S FULL SENTENCING
MEMORANDUM UNDER SEAL**

Counsel for defendant, Jack Teixeira, respectfully moves that this Court, pursuant to Federal Rule of Criminal Procedure 49.1 and Local Rule 7.2, allow the defendant to file its full Sentencing Memorandum, as well as Exhibits A and C thereto, under seal until further order of the Court. As grounds, counsel states that Exhibit A to the Sentencing Memorandum is a neuropsychological assessment containing protected health information about Mr. Teixeira that should not be publicly available; Exhibit C is a copy of a report of the Inspector General of the Department of the Air Force, which was disclosed under seal as “Sensitive” discovery material pursuant to this Court’s Stipulated Protective Order, dated, October 3, 2023 (Dkt. No. 111); and Defendant’s Sentencing Memorandum contains quotations from these two exhibits. Counsel has conferred with the Government who assents to this request. Consistent with the parties’ discussion, Mr. Teixeira will thereafter file a redacted version of his Sentencing Memorandum, which will redact any information subject to the protective order except that which is publicly available from other sources. The parties intend to discuss and quote the findings of the neuropsychological assessment and its basis in their submissions but agree that the report itself should remain under seal until further order of the Court.

Date: October 25, 2024

JACK TEIXEIRA

By his Attorneys,

/s/ Brendan Kelley

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CERTIFICATE OF SERVICE

I, Brendan Kelley, hereby certify that this document, filed through the ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) on October 25, 2024.

/s/ Brendan Kelley

Brendan Kelley