IN THE UNITED STATES COURT OF FEDERAL CLAIMS
BID PROTEST

CHAINALYSIS GOVERNMENT SOLUTIONS, LLC Plaintiff, v. UNITED STATES Defendant.	No. 26-1067 C (Judge _____)

MOTION FOR LEAVE TO FILE UNDER SEAL

Pursuant to Paragraph 4 of Appendix C, *Procedure in Protest Cases*, to the Rules of the United States Court of Federal Claims ("RCFC") and 28 U.S.C. § 1491(b)(1), Plaintiff Chainalysis Government Solutions, LLC ("CGS"), through undersigned counsel, moves for leave to file its Complaint under seal.

1. CGS files this Motion along with its Complaint challenging the Department of Homeland Security, Immigration and Customs Enforcement's ("Agency") decision to award a sole-source contract TRM Labs, Inc. ("TRM") under Solicitation No. 192126VHQ4CCC00XX.

2. CGS submitted a capability statement in response to the Notice of Intent to Sole-Source and its direct economic interests will be affected by the Agency's arbitrary, capricious, and unreasonable decision.

3. The Complaint contains confidential and proprietary information and trade secrets of CGS the public release of which would cause competitive harm to CGS.

WHEREFORE, CGS respectfully requests that the Court grant this request for leave to file its Complaint under seal.

Dated: July 27, 2026

Respectfully submitted,

Marques O. Peterson
PILLSBURY WINTHROP SHAW PITTMAN LLP
1200 Seventeenth Street, NW
Washington, DC 20036
202.663.8000
202.663.8007 (fax)
marques.peterson@pillsburylaw.com

Attorney of Record for Chainalysis Government Solutions, LLC.

Of Counsel:
J. Matthew Carter
Sarah M. Robitaille
Timothy A. Wieroniey
PILLSBURY WINTHROP SHAW PITTMAN LLP
725 South Figueroa Street, 36th Floor
Los Angeles, CA 90017-5406
(213) 488-7102
(213) 629-1033 (fax)
matt.carter@pillsburylaw.com
sarah.robitaille@pillsburylaw.com
tim.wieroniey@pillsburylaw.com

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing was filed electronically via the CM/ECF system. A true and correct copy was also served by email to the following parties, this 27th day of July 2026:

United States Department of Justice
Commercial Litigation Branch
1100 L Street, NW, 8th Floor
Washington, D.C. 20530
Fax: (202) 305-2062
Email: nationalcourts.bidprotest@usdoj.gov

Steve Gillingham
Assistant Director
United States Department of Justice
Commercial Litigation Branch
P.O. Box 480
Ben Franklin Station
Washington, D.C. 20044
E-mail: steve.gillingham@usdoj.gov

Marques O. Peterson