

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

In the Matter of the Search of the Real Property  
and Premises of Hannah Natanson

Case No. 1:26-sw-54-WBP

**THE WASHINGTON POST’S AND HANNAH NATANSON’S  
NON-CONFIDENTIAL MEMORANDUM  
ACCOMPANYING MOTION FOR AN ORDER PROVIDING PROSPECTIVELY FOR  
FILING DOCUMENTS UNDER SEAL PURSUANT TO LOCAL RULE 49(E)**

Pursuant to Local Criminal Rule 49(E) for the United States District Court for the Eastern District of Virginia, WP Company LLC d/b/a The Washington Post and Hannah Natanson ask for an Order sealing the document titled “The Washington Post’s and Hannah Natanson’s Response to Filter Team Procedures and Proposed Review Protocol,” submitted under seal contemporaneously with this pleading.

**I. Items to be Sealed and Necessity for Sealing**

The document responds to the document titled “Redacted Filter Team Procedures with Respect to Search Warrant Executed on January 14, 2026 for Digital Devices, Electronic Storage Media, and Cellphones of Hannah Natanson,” filed under seal by the United States on February 20, 2026. The United States filed that document under seal because it contained information with respect to the protocols involved in searching for information responsive to search warrants. Sealing is necessary as to this responsive document for the same reasons.

**II. Previous Court Decisions Which Concern Sealing Documents**

The Court has the inherent power to seal materials submitted to it. *See In re Knight Publ’g Co.*, 743 F.2d 231, 235 (4th Cir. 1984) (“The trial court has supervisory power over its own records

and may, in its discretion, seal documents if the public's right of access is outweighed by competing interests.”).

### **III. Period of Time to Have the Documents Under Seal**

The materials to be filed under seal should remain sealed in perpetuity or, in the alternative, so long as the document titled “Redacted Filter Team Procedures with Respect to Search Warrant Executed on January 14, 2026 for Digital Devices, Electronic Storage Media, and Cellphones of Hannah Natanson” remains sealed.

WHEREFORE, The Washington Post and Hannah Natanson request that an Order be entered allowing the document titled “The Washington Post’s and Hannah Natanson’s Response to Filter Team Procedures and Proposed Review Protocol” to be placed Under Seal.

Dated: March 3, 2026

Respectfully submitted,

/s/ Simon Latcovich  
Simon A. Latcovich (VSB No. 73127)  
Sean M. Douglass (VSB No. 83835)  
Thomas G. Hentoff (*pro hac vice*)  
Tobin J. Romero (*pro hac vice*)  
Nicholas G. Gamse (*pro hac vice*)  
WILLIAMS & CONNOLLY LLP  
680 Maine Avenue SW  
Washington, DC 20024  
Telephone: (202) 434-5000  
Facsimile: (202) 480-8371  
slatcovich@wc.com  
sdouglass@wc.com  
thentoff@wc.com  
tromero@wc.com  
ngamse@wc.com

*Counsel for Movant The Washington Post*

/s/ Amy Jeffress  
Amy Jeffress (VSB No. 36060)  
Trisha Anderson (*pro hac vice*)  
HECKER FINK LLP  
1050 K Street NW, Suite 1040  
Washington, DC 20001  
Telephone: (212) 763-0883  
ajeffress@heckerfink.com  
tanderson@heckerfink.com

*Counsel for Movant Hannah Natanson*

**CERTIFICATE OF SERVICE**

I hereby certify that on March 3, 2026, I electronically filed the foregoing document with the Clerk of Court for the U.S. District Court, Eastern District of Virginia, using the electronic case filing system of the court.

/s/ Simon Latcovich  
Simon A. Latcovich (VSB No. 73127)

*Counsel for The Washington Post*