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UNITED STATES OF AMERICA

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

IN RE: PUBLIC FIRST LAW
CENTER

MISC. NO. 26-00112 DKW-KJM

MOTION TO SEAL AND FILE *EX*
PARTE UNITED STATES'
OPPOSITION TO MOTION TO
UNSEAL [ECF NO. 1] AND
EXHIBIT A; CERTIFICATE OF
SERVICE

**MOTION TO SEAL AND FILE *EX PARTE* UNITED STATES'
OPPOSITION TO MOTION TO UNSEAL [ECF NO. 1] AND EXHIBIT A**

The United States, by and through undersigned counsel, as an interested party respectfully moves the Court for an order permitting the filing under seal and *ex parte* of its opposition (“Opposition”) to movant Public First Law Center’s motion to unseal (ECF No. 1).

The government’s Opposition refers to and extensively discusses sealed filings, including but not limited to, the Government’s Sealed Motion at Dkt. 1809 (hereinafter “Sealed Motion 1809”) filed in *United States v. Miske, et al.*, No. 19-cr-00099-DKW-KJM (D. Haw.), which is one of the subjects of Public First Law Center’s motion to unseal. Exhibit A to the Opposition is a proposed redacted version of Kaulana Freitas’s Sealed Sentencing Memorandum at ECF No. 1820 (hereinafter “Sentencing Memorandum”) filed in *United States v. Miske*, Case No. 19-CR-99-DKW-KJM.

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Accordingly, the United States seeks leave to file a redacted public version of its Opposition, which redacts content that would disclose the nature and substance of Sealed Motion 1809 and Sentencing Memorandum, or other sealed filings and confidential, sensitive, and non-public information (such as Presentence Investigation Reports), and file an unredacted version under seal and *ex parte*.

DATED: May 1, 2026, at Honolulu, Hawaii.

Respectfully Submitted,

KENNETH M. SORENSON
United States Attorney
District of Hawaii

By: /s/ Aislinn Affinito
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PROPOSED ORDER

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MISC. NO. 26-00112 DKW-KJM

[PROPOSED] ORDER GRANTING
MOTION TO SEAL AND FILE *EX*
PARTE UNITED STATES'
OPPOSITION TO MOTION TO
UNSEAL [ECF NO. 1] AND
EXHIBIT A

**[PROPOSED] ORDER GRANTING MOTION TO SEAL AND FILE *EX*
PARTE UNITED STATES' OPPOSITION TO MOTION TO UNSEAL [ECF
NO. 1] AND EXHIBIT A**

The United States of America, through counsel, having moved this Court for
an order allowing the filing under seal and *ex parte* of its Opposition to Motion to

Unseal [ECF No. 1] and Exhibit A,

NOW, THEREFORE, GOOD CAUSE APPEARING, IT IS HEREBY
ORDERED that the United States' Opposition to Motion to Unseal [ECF No. 1]
and Exhibit A may be filed under seal and *ex parte*.

DATED: _____, at Honolulu, Hawaii.

HON. DERRICK K. WATSON
United States District Judge
District of Hawaii