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Attorney for Defendant
Jamey Denise Jackson

In the United States District Court

District of Hawai'i

In re: Public First Law Center,

Movant.

1:26-mc-250-JMS-KJM
(22-cr-93-JMS)

Response to PFLC's Position
Statement Re: Motion for Leave to
File Materials Under Seal.

Hon. Judge J. Michael Seabright

**Response to PFLC's Position Statement
Re: Motion for Leave to File Materials Under Seal**

The PFLC does not oppose temporary sealing of Ms. Jackson's response to its motion to unseal. ECF 12. But it asserts that under LR5.2(c), Ms. Jackson has to first identify what compelling interests are harmed by submitting an unredacted response to the motion to unseal. ECF 12 at 2.

Ms. Jackson has identified the compelling interests in the response attached to her motion for leave. *See* ECF 11-1. Local rules in criminal cases let Ms. Jackson to avoid filing her motion "in the public record when doing so would endanger" her. CrimLR 5.2(b)(1)(B). The rule may not apply here, but it aligns with the compelling interests identified in her response. *See* ECF 11-1 at 12.

Ms. Jackson's response also refers to materials from her criminal case that are under seal. *Id.* The parties are encouraged to refrain from making public references to them. CrimLR 5.2(b)(5). And while this is a civil matter, it is related to materials that were sealed in Ms. Jackson's criminal case. The redactions in ECF 11-1 ensure that the materials sealed in the criminal case are not exposed to the public before the Court determines PFLC's motion to unseal.

Based on the compelling interests identified in ECF 11-1, Ms. Jackson requests leave to file her response to PFLC's motion under seal.

Dated: August 14, 2026.

/s/ Benjamin Lowenthal
Benjamin E. Lowenthal
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Jamey D. Jackson