

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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	:	
UNITED STATES OF AMERICA,	:	
	:	
	:	
v.	:	S4 11-CR-205 (AKH)
	:	
CILIA ADELA FLORES de MADURO, <i>et al.</i>	:	
	:	
Defendants.	:	
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NOTICE OF MOTION AND MOTION TO SEAL

Pursuant to Rule 4.B of Your Honor's Individual Rules, Cilia Adela Flores de Maduro respectfully requests permission to file under seal

(1) the unedited or redacted copy of all medical records for Cilia Adela Flores de Maduro provided to the defense by the prosecution in the above-styled case with accompanying affidavit from Mark E. Donnelly.

These records contain confidential information related to Ms. Flores de Maduro and are provided to the Court for review in connection with her application for pretrial release.

In accordance with the Court's procedures:

A sealed version of the medical records is being filed on ECF. An unredacted version is being submitted to Chambers via hand delivery, as per Rule 4.B.i.

Respectfully submitted,

/s/ Mark E. Donnelly

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