

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

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|---------------------------------|---|---------------------------------------|
| UNITED STATES OF AMERICA |) | Criminal No. 11-CR-10260 |
| |) | |
| |) | M.J. /Court Nos. 11m-5013-JGD, |
| v. |) | 11m-5014-JGD, 11m-5015-JGD, |
| |) | 11m-5031-JGD, 11m-5061-JGD, |
| AARON SWARTZ, |) | 11m5062-JGD, 11m-5063-JGD, |
| Defendant |) | 11m-5143-JGD, and 11m-5138-JGD |

**MOTION TO UNSEAL SEARCH WARRANTS,
ASSET FORFEITURE SEIZURE WARRANT, AND SUPPORTING APPLICATIONS**

The United States of America hereby moves this Court to direct that the Search Warrants, Asset Forfeiture Seizure Warrant and supporting Applications be unsealed in the following matters for the limited purpose of providing copies to the defendant and the Middlesex District Attorney's Office: M.J./Court Nos. 11m-5013-JGD, 11m-5014-JGD, 11m-5015-JGD, 11m-5031-JGD, 11m-5061-JGD, 11m5062-JGD, 11m-5063-JGD, 11m-5143-JGD and 11m-5138-JGD.

In support of this motion, the government states that the defendant surrendered to an arrest warrant on July 19, 2011. The government seeks to provide these materials to the defendant as part of automatic discovery. In addition, the government has been asked by the Middlesex District Attorney's Office to make these materials available to it, as they contain facts potentially material to a criminal matter pending in Middlesex County regarding the defendant.

Government counsel has conferred with defense counsel pursuant to Local Rule 7.2(a)(2), and defense counsel assents to the limited unsealing sought herein.

Respectfully submitted,

CARMEN M. ORTIZ
United States Attorney

By: /s/ Stephen P. Heymann
Stephen P. Heymann
Scott L. Garland
Assistant U.S. Attorneys

Date: July 21, 2011

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) .

/s/ Stephen P. Heymann
Stephen P. Heymann
Assistant United States Attorney

Date: July 21, 2011