

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
JACKSON DIVISION**

**UNITED STATES OF AMERICA**

**v.**

**CRIMINAL NO. 3:08-cr-00107**

**FRANK E. MELTON  
MICHAEL RECIO  
MARCUS WRIGHT**

**GOVERNMENT'S MOTION FOR LEAVE TO FILE  
THREE MOTIONS UNDER SEAL**

The United States, through its undersigned counsel, respectfully requests, pursuant to the Court's instruction from the bench on November 11, 2008, leave to file under seal three motions that contain sensitive or inflammatory information. The motions are as follows: 1) Motion in Limine to Preclude Any Reference to Findings of Misconduct of Police Officer Witnesses that Do Not Concern Lack of Truthfulness; 2) Motion in Limine to Exclude Reference to Allegations of Misconduct by Marcus Wright; and 3) Motion to Reconsider Ruling Precluding at Trial Certain Statements by Defendant Frank Melton. The government has provided copies of its motions it seeks to file under seal to the Court and to defense counsel.

Respectfully submitted,

**GRACE CHUNG BECKER**  
Acting Assistant Attorney General  
Civil Rights Division  
United States Department of Justice

By: /s/ Mark Blumberg  
Deputy Chief  
Criminal Section  
Civil Rights Division

/s/ Patricia A. Sumner  
Trial Attorney  
Criminal Section  
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**CERTIFICATE OF SERVICE**

I, the undersigned counsel for the United States, hereby certify that on the 1st day of December, 2008, I electronically filed the foregoing with the Clerk of the Court using the ECF system which sent notification of such filing to the following:

John Reeves, Attorney for Frank E. Melton

John M. Colette and Matt Baldrige, Attorneys for Defendant Marcus Wright;

and

Cynthia Stewart, Attorney for Michael Recio.

/s/ Mark Blumberg