

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

**UNITED STATES OF AMERICA**

\*

**v.**

\*

**Criminal No. RDB-10-181**

**THOMAS ANDREWS DRAKE**

\*

**MOTION FOR LEAVE TO FILE SEALED MATERIALS**

Thomas Andrews Drake, through his attorneys, hereby moves this Honorable Court for leave to file portions of his sentencing memorandum and his supporting character letters under seal.

As grounds for this motion, the defense states certain sections of the memorandum contain confidential, personal information relating to Mr. Drake's family, and the character letters contain some confidential information as well as personal identifying information.

WHEREFORE, the defense requests that this Honorable Court grant its motion for leave to file certain sections of its sentencing memorandum and the character letters under seal.

Respectfully submitted,

/S/

---

JAMES WYDA, #25298  
Federal Public Defender  
DEBORAH L. BOARDMAN, #28655  
Assistant Federal Public Defender  
Office of the Federal Public Defender  
100 South Charles Street  
Tower II, 9<sup>th</sup> Floor  
Baltimore, Maryland 21201  
Phone: 410-962-3962  
Fax: 410-962-0872  
Email: Jim\_Wyda@fd.org  
Deborah\_Boardman@fd.org