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Attorney for Defendant Santilli

**UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON**

**UNITED STATES OF AMERICA,**

**Plaintiff,**

**vs.**

**PETER SANTILLI,**

**Defendant.**

**Case No. 3:16-cr-00051-BR**

**MOTION FOR LEAVE TO FILE  
MOTION UNDER SEAL**

Defendant Peter Santilli, through his attorney, Thomas K. Coan, moves the court for an order allowing him to file the enclosed motion *ex-parte* and under seal because it contains confidential work product that should not be shared with the government or the other parties in this case.

Dated this 17<sup>th</sup> day of March 2016.

Thomas K. Coan  
Thomas K. Coan, OSB 89173  
Attorney for Defendant