

**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	CIVIL NO. 3:10cv 00747
EBONY WOOD IN VARIOUS FORMS)	JUDGE HAYNES
)	
Defendant.)	

MOTION FOR LEAVE TO FILE ATTACHMENTS TO AFFIDAVIT UNDER SEAL

Now comes the United States of America by Jerry E. Martin, United States Attorney for the Middle District of Tennessee, and moves this Honorable Court for leave to file the Attachments to the Affidavit of Special Agent Kevin Seiler under seal (Exhibit 1 to the Memorandum in Support of Motion to Strike Claims for Lack of Standing after a Hearing). In support thereof, many of these Attachments were obtained from the business location of Gibson Guitar, Corp. (“Gibson”) during the execution of a federal search warrant, and while necessary to the Motion, these documents may contain material relevant to the business practices and procedures of Gibson that Gibson might consider privileged. Therefore, the United States requests that these attachments to Exhibit 1 of the Memorandum be filed under seal (available only for viewing by the parties) pending an opportunity by Gibson to comment and respond as to whether the documents should be unsealed.

Respectfully submitted,
JERRY E. MARTIN
United States Attorney for the
Middle District of Tennessee

s/Debra Teufel Phillips
Debra Teufel Phillips (BPR011706)
Assistant United States Attorney
110 Ninth Avenue South, Suite A-961
Nashville, Tennessee 37203-3870
Telephone: (615) 736-5151
Attorneys for the United States of America

CERTIFICATE OF SERVICE

I hereby certify that on this 4th day of June, 2011 a copy of the foregoing Motion to File Attachments under Seal was filed electronically. Notice of this filing will be sent to the following, if registered, by operation of the Court's electronic filing system. If not registered, notice was mailed by regular U.S. Mail to:

Steven Allen Riley
Timothy G. Harvey
W. Russell Taber , III
Riley, Warnock & Jacobson
1906 West End Avenue
Nashville, TN 37203

David Alexander Fardon
Harwell, Howard, Hyne, Gabbert & Manner, P.C.
315 Deaderick Street
Suite 1800
Nashville, TN 37238

s/ Debra Teufel Phillips
Debra Teufel Phillips