

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

IN THE MATTER OF THE APPLICATION  
OF THE NEW YORK TIMES COMPANY  
FOR ACCESS TO CERTAIN SEALED  
COURT RECORDS

Misc. Action No. 1:08-mc-00576-RCL

**UNOPPOSED MOTION TO SEAL DECLARATION AND  
FOR PERMISSION TO FILE DECLARATION IN REDACTED FORM**

The New York Times Company and Los Angeles Times Communications LLC (together, “Movants”), hereby respectfully move the Court for an Order sealing the Declaration of Jeanette Melendez Bead. In support of this Motion, Movants aver as follows:

1. On September 29, 2008, Movants filed a Motion for Order Setting Date by Which the Government Shall File Opposition to Motion for Public Access to Certain Sealed Records.
2. The Declaration of Jeanette Melendez Bead (the “Bead Declaration”), which was submitted with the Motion, inadvertently included the personal cell phone number of Rachel Carlson Lieber, the Assistant United States Attorney representing the government in this matter.
3. Ms. Lieber’s personal cell phone number is not essential to the motion, and Movants therefore request that they be permitted to substitute a new version of the Bead Declaration with Ms. Lieber’s personal cell phone number redacted. A copy of the new version is attached hereto as Exhibit A.
4. Movants are authorized to inform the Court that the government does not oppose this Motion.

