

IN THE  
*Supreme Court of the United States*

OKELLO CHATRIE,  
*Petitioner,*

v.

UNITED STATES OF AMERICA,  
*Respondent.*

On Writ of Certiorari  
To the United States Court of Appeals  
For the Fourth Circuit

**CONSENT MOTION FOR LEAVE TO FILE ONE VOLUME OF  
THE JOINT APPENDIX UNDER SEAL**

Petitioner Okello Chatrie respectfully seeks leave to file under seal a confidential joint appendix consisting of one volume (JA Volume III). That volume contains the raw data that Google provided in response to law enforcement’s geofence warrant, as well as the “Three Paths” video, which uses that data to plot the movements of three Google user bystanders. The district court held that sealing was required to protect the privacy interests of the Google users whose real location data is contained in these filings, citing *Ashcraft v. Cocono, Inc.* 218 F.3d 288,

302 (4th Cir. 2000). Both documents were accordingly kept under seal by the district court and court of appeals in this case. Counsel for the Government has consented to filing this volume under seal and to this motion.

Respectfully submitted,

Adam G. Unikowsky  
*Counsel of Record, Petitioner Okello Chatrie*