

THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION

No. 3:75-CR-26-3
No. 5:06-CV-24-F

UNITED STATES OF AMERICA)	
)	
)	
vs.)	MOTION TO SEAL
)	
)	
JEFFREY R. MacDONALD)	
Defendant.)	

Pursuant to Local Criminal Rule 55.2.1 and Local Civil Rule 79.2, EDNC, Defendant Jeffrey R. MacDonald (“Defendant”) respectfully moves the Court to seal Mr. Raymond M. Shea’s affidavit filed as a proposed sealed Exhibit 1 to his Notice of Filing in response to the Court’s order filed on March 16, 2012 [DE-245]. As grounds for this motion to seal, counsel would show the Court that the affidavit contains personal information of The MacDonald Defense Fund’s administrator, Mr. Raymond M. Shea. Counsel respectfully requests that the affidavit [DE-246] be sealed to protect the privacy of Mr. Raymond M. Shea.

This the 26th day of March, 2012.

/s/ M. Gordon Widenhouse, Jr
M. Gordon Widenhouse, Jr.
Rudolf Widenhouse & Fialko
Attorney for Defendant Jeffrey R. MacDonald
N.C. State Bar No. 10107
312 West Franklin Street
Chapel Hill, NC 27516
mgwidenhouse@rwf-law.com
Telephone: (919) 967-4900
Fax: (919) 967-4953

/s/ Christine Mumma

Christine Mumma

Attorney for Defendant Jeffrey R. MacDonald

Executive Director

North Carolina Center on Actual Innocence

P.O. Box 52446, Shannon Plaza Station

Durham, NC 27717-2446

Email: admin@nccai.org

Telephone: (919) 489-3268

Fax: (919) 489-3285

N.C. State Bar No. 26103

CERTIFICATE OF SERVICE

The undersigned certifies that on March 26, 2012, the foregoing **MOTION TO SEAL** was electronically filed with the Clerk of Court, United States District Court for the Eastern District of North Carolina, using the CM/ECF system. The CM/ECF system will send electronic notification of such filing to all parties.

/s/ M. Gordon Widenhouse, Jr
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Rudolf Widenhouse & Fialko
Attorney for Defendant Jeffrey R. MacDonald
N.C. State Bar No. 10107
312 West Franklin Street
Chapel Hill, NC 27516
mgwidenhouse@rwf-law.com
Telephone: (919) 967-4900
Fax: (919) 967-4953

/s/ Christine Mumma
Christine Mumma
Attorney for Defendant Jeffrey R. MacDonald
Executive Director
North Carolina Center on Actual Innocence
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Durham, NC 27717-2446
Email: admin@nccai.org
Telephone: (919) 489-3268
Fax: (919) 489-3285
N.C. State Bar No. 26103