

1 49.1(d). This application contains information that is protected by the attorney-client privilege and
2 the work product privilege, including defense trial strategy. Failure to seal the application would
3 impinge upon Mr. Reger’s constitutional rights because he would not be able to provide the same
4 frank, detailed information in a public filing.

5 Specifically, through this application, Mr. Refer is seeking the appointment of an additional
6 lawyer and investigator. If granted opposing counsel will certainly become aware a second lawyer
7 was appointed. However, the declaration in support of the request contains significant work product
8 and detailed information about defense strategy to which the government is not entitled.

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10 There is good cause for this court to use its authority under Federal Rule of Criminal
11 Procedure 49.1(d) to file the 17(c) application and accompanying documents under seal.

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13 Dated: September 6, 2023

Respectfully submitted,

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15 By /s/ Kresta Nora Daly
16 KRESTA NORA DALY
17 Attorneys for Bradley Earl Reger
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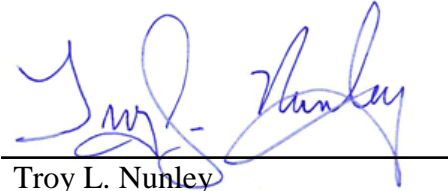
BARTH DALY LLP
Attorneys At Law

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ORDER

Good cause appearing, the Court hereby orders the application for a second attorney and investigator and accompanying documents sealed.

Dated: September 7, 2023



Troy L. Nunley
United States District Judge

BARTH DALY LLP
Attorneys At Law