

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

IN RE JPMORGAN PRECIOUS	§	Master Docket No. 18-cv-10356 (JGK)
METALS SPOOFING LITIGATION	§	
	§	CLASS ACTION

**MOTION TO SEAL**

The United States respectfully requests permission to file *ex parte* and under seal portions of the government’s Unopposed Motion of the United States to Intervene and to Stay. The proposed *ex parte* and sealed portions of the motion contain information related to an ongoing criminal investigation by the United States. Disclosure of that information would be detrimental to the government’s investigation because it could lead to destruction of evidence, flight from prosecution, and otherwise interfere with the government’s ability to conduct its investigation. Therefore, the information should not be in the public record or shared with the plaintiffs or defendants in this case. The government has filed a redacted version of its motion on the public docket.

Dated: February 21, 2019

Respectfully submitted,

ROBERT ZINK  
Acting Chief

By: /s/ Avi Perry  
Avi Perry  
Matthew F. Sullivan  
Trial Attorneys  
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**CERTIFICATE OF SERVICE**

I, Avi Perry, hereby certify that on February 21, 2019, I electronically filed the foregoing Motion to Seal with the Clerk of Court using the CM/ECF electronic filing system, which will automatically send a Notice of Electronic Filing to all parties.

/s/ Avi Perry

Avi Perry  
Trial Attorney  
Criminal Division, Fraud Section  
U.S. Department of Justice