

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF ILLINOIS

MATTHEW HALE,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	Civil No. 23-cv-01296-DWD
	)	
FEDERAL BUREAU OF PRISONS,	)	
	)	
Defendant.	)	

**UNOPPOSED MOTION TO KEEP CERTAIN EXHIBITS UNDER SEAL**

COMES NOW Defendant Federal Bureau of Prisons (“the BOP”), by and through its attorneys, Steven D. Weinhoef, U.S. Attorney for the Southern District of Illinois, and Assistant U.S. Attorney Kyle Christopher Oehmke, and for its Unopposed Motion to Keep Certain Exhibits Under Seal, states as follows:

1. On January 16, 2026, the Court entered a Protective Order (Doc. 93). Thereafter, the BOP produced many documents marked “CONFIDENTIAL” (“Confidential Documents”) to Plaintiff’s counsel. Pursuant to the Protective Order, Plaintiff himself is not to receive Confidential Documents. *See* Doc. 93, ¶¶ 9-11.

2. The Protective Order states, in pertinent part, as follows: “If materials subject to this Protective Order are used in any proceeding, they shall not lose their protection through such use and all parties shall take all steps reasonably required to protect such information. In this respect, if the materials are to be used or referenced in . . . motions . . . , the materials shall be maintained under seal until such time as the Court can examine and determine whether they may be made public.” Doc. 93, ¶ 17 (emphasis added).

3. On today's date, the BOP will publicly file a Motion for Summary Judgment and Supporting Memorandum. In support of its Motion, the BOP will publicly file five supporting exhibits (Exhibit 1-A, Exhibit 1-F, Exhibit 1-G, Exhibit 2, and Exhibit 3).

4. In support of its Motion for Summary Judgment, the BOP will also file under seal twelve exhibits (Exhibit 1, Exhibit 1-B, Exhibit 1-C, Exhibit 1-D, Exhibit 1-E, Exhibit 1-H, Exhibit 1-I, Exhibit 1-J, Exhibit 1-K, Exhibit 1-L, Exhibit 1-M, and Exhibit 1-N). With the exception of Exhibit 1, each of these exhibits represents Confidential Documents. Meanwhile, Exhibit 1 is a Declaration signed by Michael Collis (Intelligence Analyst with the BOP) who discusses the other sealed exhibits and other matters that implicate security, privacy, and confidentiality concerns.

5. The undersigned has communicated with Plaintiff's counsel about the relief sought by this Motion, and he has no objection thereto.

WHEREFORE, for the foregoing reasons, the United States prays the Court grants its Unopposed Motion to Keep Certain Exhibits Under Seal, whereby the Court allows the following exhibits to remain under seal: Exhibit 1, Exhibit 1-B, Exhibit 1-C, Exhibit 1-D, Exhibit 1-E, Exhibit 1-H, Exhibit 1-I, Exhibit 1-J, Exhibit 1-K, Exhibit 1-L, Exhibit 1-M, and Exhibit 1-N. The United States further prays for all other relief the Court deems just and proper under the circumstances.

Respectfully submitted,

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United States Attorney

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