

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

In re Grand Jury Subpoena No.
2026R00350-01

Case No. 1:26-cv-02777-WMR

MOTION TO FILE SUPPLEMENTAL POSTHEARING BRIEF OF
UNITED STATES OF AMERICA IN CAMERA AND
ACCOMPANYING MEMORANDUM OF LAW

The United States moves this Court to allow it to file a supplemental brief *in camera*. As grounds, the United States asserts as follows:

1. The Court has asked the United States to set forth “any arguments concerning any potential theory of wrongdoing that it contends supports the subpoena at issued.” (Doc. 15.) In its Order, the Court recognized “that the information relevant to this issue may involve confidential investigative material.” (Doc. 15 at 2.)

2. The proper procedure to protect this sensitive investigative material is *in camera* review by the Court. *See United States v. R. Enters., Inc.*, 498 U.S. 292, 302 (1991) (“[A] district court may require that the Government reveal the subject of the investigation to the trial court *in camera*”); *see also In re Grand Jury Empaneling of Special Grand Jury*, 171 F.3d 826, 836 (3d Cir. 1999) (“We have consistently endorsed the use of *in camera* proceedings to preserve grand jury secrecy.”).

3. The United States will submit a copy of its supplemental brief to the Court's Sealed Docketing inbox for consideration by the Court. If the Court declines to consider the supplemental brief *in camera*, the United States asks that it be placed under seal.

WHEREFORE, the United States asks that the Court consider its supplemental brief *in camera*, or, in the alternative, place it under seal.

/s/ DAN BISHOP
DAN BISHOP
Special Attorney to the Attorney General
and United States Attorney for the Middle
District of North Carolina
N.C. State Bar Number 17333
101 S. Edgeworth St., Fourth Floor
Greensboro, NC 27401
Telephone: (336) 332-6333
E-mail: Dan.Bishop@usdoj.gov

CERTIFICATE OF COMPLIANCE

I hereby certify, pursuant to LR 5.1(C) and 7.1(D), that I prepared the foregoing motion using Century Schoolbook, 13 point font.

/s/ DAN BISHOP
DAN BISHOP
Special Attorney to the Attorney General
and United States Attorney for the Middle
District of North Carolina

CERTIFICATE OF SERVICE

I certify that the foregoing motion has been filed with the Court using its CM-ECF system, which will generate notice to counsel of record.

This 5th day of June, 2026.

/s/ DAN BISHOP

DAN BISHOP

Special Attorney to the Attorney General
and United States Attorney for the Middle
District of North Carolina

RETRIEVED FROM DEMOCRACYDOCKET.COM