

IN THE UNITED STATES ARMY COURT OF CRIMINAL APPEALS

UNITED STATES,

Appellee

v.

Sergeant (E-5)
TREVAR D. TINSLEY
United States Army,
Appellant

MOTION TO PHOTOCOPY
SEALED APPELLEE BRIEF

Docket No. ARMY 20200337

Tried at Fort Bragg, North Carolina, on
14 April, 22-24 June, and 1 July 2020,
before a general court-martial
appointed by Commander, United
States Army John F. Kennedy Special
Warfare Center and School, Colonel
Charles Pritchard and Lieutenant
Colonel Christopher Martin, Military
Judges, presiding.

**TO THE HONORABLE, THE JUDGES OF THE UNITED STATES ARMY
COURT OF CRIMINAL APPEALS**

COME NOW the undersigned appellate defense counsel, pursuant to Rules 6.9, 6.11, 23, and 32.1 of this court's Rules of Appellate Procedure, on behalf of appellant, and move for leave to photocopy and transmit one copy of Appellee's Sealed Brief in this case to the undersigned civilian appellate defense counsel. Undersigned counsel contemporaneously submit a motion for both appellate defense counsel to examine the requested sealed brief.

Both appellate defense counsel must review this information to properly represent the interests of our client in this case, and submit a reply brief.

Counsel move for leave to photocopy and transmit the above listed material only.

Michael Millios' office is located in Minneapolis, Minnesota, and he currently has no planned trips to the Washington D.C. area. Requiring counsel to travel to Fort Belvoir to view the sealed records in person would cause an undue hardship on counsel and appellant, particularly given the increased risk to the community during the COVID-19 pandemic. Both undersigned counsel acknowledge our professional and ethical obligations to protect the sealed materials, as well as the prohibition on disclosure listed in R.C.M. 1113(b)(3).

WHEREFORE, appellant respectfully requests that the Court grant this motion.

PANEL NO. 3

MOTION TO PHOTOCOPY
SEALED BRIEF

GRANTED: _

DENIED: _____

DATE: 26 AUG 2021



FOR Michael Millios
Civilian Appellate Defense Counsel



CPT, JA
Appellate Defense Counsel

CERTIFICATE OF FILING AND SERVICE

I certify that a copy of the foregoing was electronically submitted to Army Court and Government Appellate Division on August 25, 2021.



MELINDA J. JOHNSON
Paralegal Specialist
Defense Appellate Division

