STATE OF WISCONSIN : CIRCUIT COURT : MANITOWOC COUNTED

STATE OF WISCONSIN,	)	
Plaintiff,	) )	
v.	)	Case No. 05-CF-381
STEVEN A. AVERY,	)	
Defendant.	)	

## DEFENDANT'S AMENDED MOTION TO SEAL EXHIBIT

Defendant, Steven Avery, by his undersigned attorney, respectfully moves to seal an exhibit pursuant to Wis. Stat. § 801.21. In support thereof, Mr. Avery states as follows:

- 1. This Court previously ordered the Clerk of the Circuit Courts to place Exhibit 22 (a CD) to Defendant's Motion to Supplement Previously Filed Motion for Post-Conviction Relief under seal.
- 2. Exhibit 22 consisted of a portion of Detective Velie's report of a forensic examination of the computer seized from Bobby Dassey's bedroom during the investigation into Theresa Halbach's murder.
- 3. On Exhibit 22 are documents Defendant bates-stamped AverySupp0001-2449. The documents included images of, *inter alia*, violent pornography, pornography involving individuals who appear to be younger than 18 years old, and other disturbing images of violence.

4. Defendant included in Exhibit 22 the range of pages that included, per Detective Velie, the pornographic images and searches referenced above.

5. However, since filing Defendant's motion, Defendant has learned that Detective Velie was incorrect in that there are several other violent pornographic images on the Dassey computer referenced in the report.

6. Defendant is therefore submitting the remainder of Detective Velie's report of the examination of the Dassey computer on CD. The pages of images and data therein are bates-stamped AverySupp2450-6545.

7. Again, because the exhibit contains sensitive images as described herein, Mr. Avery submits that it would be appropriate for this Court to maintain the exhibit under seal.

Wherefore, for the reasons stated herein, Mr. Avery respectfully requests that this Court seal the exhibit to Mr. Avery's reply in support of his supplemental postconviction petition consisting of the images and data from the CD (AverySupp2450-6545) under seal.

Respectfully submitted,

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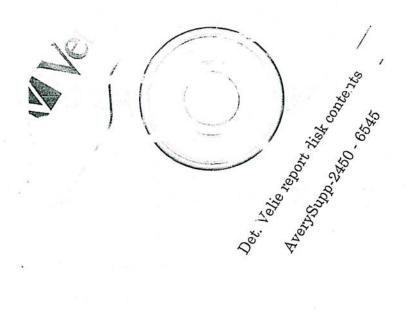
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## CERTIFICATE OF SERVICE

I certify that on August 3<sup>rd</sup>, 2018, a true and correct copy of Defendant's Reply to the State's Response to Defendant's Motion to Seal Exhibit, was furnished via electronic mail and by Federal Express, postage prepaid to:

Ms. Jacalyn C. LaBre
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1010 South 8<sup>th</sup> Street
3<sup>rd</sup> Floor, Room 325
Manitowoc, WI 54220

Mr. Thomas J. Fallon Ms. Lisa E.F. Kumfer Ms. Tiffany Winter Assistant Attorney General P.O. Box 7857 Madison, WI 53707

Mark S. Williams 11708 Settlers Road Cedarburg, WI 53012

Honorable Judge Angela W. Sutkiewicz Circuit Court Judge Sheboygan County Courthouse 615 North 6<sup>th</sup> Street Sheboygan, WI 53081

Lynn Zigmunt Clerk of the Circuit Court Manitowoc County Courthouse 1010 South 8<sup>th</sup> Street Manitowoc, WI 54220

Kathleen T. Zellner