

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

UNITED STATES OF AMERICA,)	
)	The Honorable Liam O’Grady
Plaintiff,)	
)	Case No. 1:12-cr-00003-LO
v.)	
)	
KIM DOTCOM, <i>et al.</i>)	
)	
Defendants.)	

**MOTION OF KYLE GOODWIN FOR LEAVE TO FILE BRIEF IN RESPONSE
TO SUPPLEMENTAL BRIEF OF SPECIALLY APPEARING DEFENDANT AND
INTERESTED PARTY MEGAUPLOAD LIMITED REGARDING RULE 41(G)
HEARING**

Kyle Goodwin has moved this Court for return of his property under Rule 41(g) of the Federal Rules of Criminal Procedure. Dkt. No. 90. The Court has requested briefing on the “suggested format and breadth” of a hearing held under that rule; Mr. Goodwin and the government have since provided their input. Dkt. Nos. 135, 136. As part of his proposal, Mr. Goodwin recommended that this Court hear testimony from himself, from the government, and from limited third-party witnesses, such as a representative of Carpathia Hosting, Inc., the company that owns the servers leased by Megaupload (and on which Mr. Goodwin’s property is presumably stored). Dkt. No. 135 at 5-6.

In addition to briefing the contours of a potential Rule 41(g) hearing, Mr. Goodwin moved to unseal certain search warrants related to the searches and seizures that took place in January 2012. Dkt. No. 131. In response, six warrants have been unsealed. Dkt. No. 143.

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