IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA	:
v.	:
CHRISTOPHER WORRELL,	:
Defendant.	:

Case No: 21-CR-292 RCL

<u>GOVERNMENT'S UNOPPOSED MOTION FOR</u> <u>ENTRY OF PROPOSED CONSENT ORDER</u>

The United States of America respectfully submits this unopposed motion requesting a court order authorizing the D.C. Department of Corrections to disclose the medical records of the defendant, Christopher Worrell, who is currently a federal pretrial detainee at the Central Detention Facility (the "D.C. Jail"), to both parties. The proposed order is attached to this filing.

The parties believe that Mr. Worrell's medical records may be relevant to litigation between the parties concerned Mr. Worrell's pretrial release under 18 U.S.C. § 3142. As such, counsel for Mr. Worrell does not object to this motion. The request in this case (and the proposed order) is also limited in scope insofar as it seeks medical records from the D.C. Jail, where Mr. Worrell has been housed only since April 13, 2021.

Therefore, the government requests that the Court issue the attached consent order requiring that the D.C. Department of Corrections disclose the medical records of the defendant to both parties.

Respectfully submitted,

CHANNING D. PHILLIPS Acting United States Attorney D.C. Bar No. 415793 /s/ William Dreher WILLIAM DREHER D.C. Bar No. 1033828 Assistant United States Attorney (Detailed) 700 Stewart Street, Suite 5220 Seattle, WA 98101 (206) 553-4579 william.dreher@usdoj.gov

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CONSENT ORDER

In consideration of the Government's Unopposed Motion for Entry of Proposed Consent Order, it is by the Court this _____ day of April 2020,

ORDERED that the D.C. Department of Corrections shall provide to the counsel specifically noted below for both parties in the above-captioned matter, for Defendant Christopher Worrell, Inmate number 377183:

1) All records, documents, and information pertaining to Mr. Worrell's diagnosis and treatment for COVID-19 (or any other illness or condition) since his entry at the D.C. Jail on April 13, 2021;

2) All records, documents, and information pertaining to the status of Mr. Worrell's medication prescriptions and refills, and any requests Mr. Worrell has made for additional medication prescriptions and refills;

3) All records, documents, and information pertaining to Mr. Worrell's requests for an access to medical treatment from April 13, 2021 until present.

FURTHER ORDERED that these materials shall be provided directly to the following counsel for the parties upon receipt of this Order:

William Dreher Assistant United States Attorney (Detailed) 700 Stewart Street, Suite 5220 Seattle, WA 98101 (206) 553-4579 william.dreher@usdoj.gov

James Kelly Counsel for Defendant Christopher Worrell PIERCE BAINBRIDGE P.C. 355 S. Grand Avenue, 44th Floor Los Angeles, CA 90071 918-727-4129 jkelly@piercebainbridge.com

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> HON. ROYCE C. LAMBERTH United States District Judge