

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

**UNITED STATES OF AMERICA**

**v.**

**CHRISTOPHER WORRELL,**

**Defendant.**

:  
:  
:  
:  
:  
:  
:  
:  
:  
:

**Case No: 21-CR-292 RCL**

**GOVERNMENT'S MOTION FOR LEAVE TO FILE UNDER SEAL ITS  
SUPPLEMENTAL BRIEF AND EXHIBITS 1 AND 3 TO THE SAME**

The United States, by and through its attorney, the Acting United States Attorney for the District of Columbia, respectfully requests permission to file under seal the government's Supplemental Brief and Exhibits 1 and 3 to the same. As grounds for this request, the government states:

Exhibits 1 and 3 are medical records from the D.C. Jail and the Howard University Hospital oncologist who treated Worrell. They contain personal and sensitive information of the defendant. The government's Supplemental Brief contains significant discussion of, and heavily quotes, from those medical records, and so also is interlaced with the defendant's personal and sensitive medical information. Accordingly, the government respectfully moves the Court to file the Government's Supplemental Brief and Exhibits 1 and 3 to the same under seal.

WHEREFORE, the United States respectfully requests that the Court grant its motion and file under seal the Supplemental Brief and Exhibits 1 and 3 to the same.

A proposed order is attached.

Date: May 25, 2021

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

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

**UNITED STATES OF AMERICA**

:  
:  
:  
:  
:  
:  
:  
:  
:

**v.**

**Case No: 21-CR-292 RCL**

**CHRISTOPHER WORRELL,**

**Defendant.**

**ORDER**

Upon the motion of the Government, it is hereby ordered this \_\_\_\_ day of \_\_\_\_\_, 2021, that, for the reasons stated, the Government’s Motion for Leave to File under Seal Its Supplemental Brief and Exhibits 1 and 3 to the Same is **granted**, and that the Supplemental Brief and Exhibits 1 and 3 to the same are **filed under SEAL**.

**SO ORDERED.**

\_\_\_\_\_  
Judge Royce C. Lamberth  
US DISTRICT COURT JUDGE