

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA	:	
	:	
v.	:	
	:	Case No: 21-CR-292 RCL
	:	
CHRISTOPHER WORRELL,	:	
	:	
Defendant.	:	

**GOVERNMENT’S UNOPPOSED MOTION FOR
ENTRY OF PROPOSED CONSENT ORDER**

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 order would authorize such disclosure now and any subsequent time, during the pendency of this case, that either party is preparing to file or files a motion before this Court in which Mr. Worrell’s medical history while in custody at the D.C. Jail is raised as an issue. The proposed order is attached to this filing.

This Court previously issued a more limited order authorizing the D.C. Jail to provide certain of Mr. Worrell’s medical records to the government. *See* Dkt. 42. Now, the government seeks Mr. Worrell’s full updated medical records, which are necessary to respond to Mr. Worrell’s Emergency Motion for Release from Custody (Dkt. 81), which was filed today. Counsel for Mr. Worrell also seeks a copy of Mr. Worrell’s medical records—which will also be provided to Mr. Worrell pursuant to the attached proposed order—and does not oppose this motion.

To be clear, the government does not concede that the Court currently has jurisdiction to address Mr. Worrell’s motion, because Mr. Worrell has a currently pending appeal before the

D.C. Circuit Court of Appeals that is an appeal of this Court's most recent order addressing Mr. Worrell's pretrial release. Nonetheless, the government is filing this motion now to expedite the process of responding to the substance of Mr. Worrell's motion, should the Court conclude that it has jurisdiction over that motion notwithstanding Mr. Worrell's pending appeal. The government will elaborate its position on this Court's jurisdiction in a response to Mr. Worrell's motion.

Respectfully submitted,

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/s/ William Dreher

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FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA

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v.

Case No: 21-CR-292 RCL

CHRISTOPHER WORRELL,

Defendant.

CONSENT ORDER

In consideration of the Government’s Unopposed Motion for Entry of Proposed Consent Order, it is by the Court this _____ day of August 2021,

ORDERED that the D.C. Department of Corrections shall provide the medical records of Defendant Christopher Worrell, Inmate number 377183, to the counsel specifically noted below for both parties in the above-captioned matter. In addition, during the pendency of this case, in the event either party is preparing to file or files a motion before this Court raising as an issue the medical care that Mr. Worrell is receiving while in the custody of the D.C. Department of Corrections, the D.C. Department of Corrections is further authorized to provide the medical records of Defendant Christopher Worrell to the counsel specifically noted below upon request of either party.

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

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HON. ROYCE C. LAMBERTH
United States District Judge