

UNITED STATES DISTRICT COURT
DISTRICT OF DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,

v.

CAUSE NUMBER 21-cr-28

MICHAEL GREENE,

Defendant

**DEFENDANT MICHAEL GREENE'S
MOTION TO UNSEAL DOCUMENTS**

TO THE HONORABLE JUDGE OF SAID COURT:

NOW COMES, MIICHAEL GREENE, Defendant in the above entitled and numbered cause, by and through Counsel, and respectfully requests this Court Order to unseal any sealed discovery documents. The discovery production has been substantial. Unfortunately, it contains significant redactions of materials favorable to the Defendant's defense.

The information respectfully demanded is required for the defense under *Brady v. Maryland*, its progeny, and the Federal and local rules. Defendant is entitled to due process of law which includes the right to prepare for trial, prepare his own defense, and prepare for presentation for trial. Potentially exculpatory information must be disclosed sufficiently in advance of trial to allow defense counsel and Defendant to research its content and implications to prepare effective cross-examination and to subpoena witnesses. Furthermore, Defendant is entitled to evidence that would show any inconsistency in witness' testimony.

The Government has violated the Defendant's rights to a fair trial and to the due process of law by failing to produce unredacted documents. Based on the review of these materials, and considering all the redactions throughout, there is no legitimate reason that these documents could

not have been provided in the normal discovery production channels. Further, it is highly prejudicial in for Defendant and defense counsel to review the documents in its current redacted state. The Defense requires unredacted copies of these documents to render effective assistance of counsel.

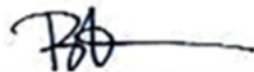
Respectfully Submitted,



Britt Redden
Texas State Bar Number: 24091241
REDDEN LAW PLLC
1407 E. FM 1585
Lubbock, TX 79423
Telephone: (214) 699-8429
Fax: (214) 845-7006
Attorney for the Defendant,
Michael Greene

CERTIFICATE OF SERVICE

On the 16th day of December 2022, I filed the foregoing document electronically with the Clerk of the Court for the United States District Court for the District of Columbia by using the Court's CM/ECF system, which will provide electronic service on all counsel of record.



Britt Redden