

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

UNITED STATES OF AMERICA	:	
	:	
v.	:	CRIMINAL NO. 21-cr-28 (APM)
	:	
THOMAS CALDWELL,	:	
DONOVAN CROWL,	:	
JESSICA WATKINS,	:	
SANDRA PARKER,	:	
BENNIE PARKER,	:	
LAURA STEELE,	:	
KELLY MEGGS,	:	
CONNIE MEGGS,	:	
KENNETH HARRELSON,	:	
ROBERTO MINUTA,	:	
JOSHUA JAMES,	:	
JONATHAN WALDEN,	:	
JOSEPH HACKETT,	:	
WILLIAM ISAACS,	:	
DAVID MOERSCHEL, and	:	
BRIAN ULRICH,	:	
	:	
Defendants.	:	

**MOTION FOR AN ORDER TO DISCLOSE ITEMS PROTECTED BY
FEDERAL RULE OF CRIMINAL PROCEDURE 6(e) AND SEALED MATERIALS**

The United States of America respectfully moves for entry by this Court of an order permitting the disclosure in discovery of materials protected by Federal Rule of Criminal Procedure 6(e). The United States also requests permission to provide in discovery sealed materials, pursuant to the previously entered protective order governing discovery. Finally, the United States requests that any order granting this motion be made applicable to co-defendants who may later be joined.

The United States conferred with counsel for the defendants regarding this motion, and counsel for defendants Caldwell, Crowl, Watkins, Sandra Parker, Bennie Parker, Steele, Minuta,

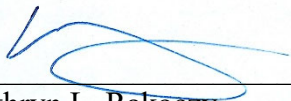
Isaacs, Walden, and Ulrich had no objection to this motion. Counsel for Kelly Meggs, Connie Meggs, Harrelson, James, Hackett, and Moerschel had not responded as of the time of filing of this motion.

WHEREFORE, the United States respectfully requests an order authorizing the disclosure in discovery of the materials described above.

Respectfully submitted,

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By:



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