## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA	:
vs.	: Case No.: 21-CR-133
THOMAS FEE,	:
DEFENDANT.	:

## UNOPPOSED 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), if applicable to this case. 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 codefendants who may later be joined.

The United States conferred with counsel for the defendant regarding this motion and counsel does not oppose the motion.

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WHEREFORE, the United States respectfully requests an order authorizing the disclosure

in discovery of the materials described above.

Respectfully submitted,

CHANNING PHILLIPS Acting United States Attorney D.C. Bar No. 415793

<u>/s/ Susan T. Lehr</u> SUSAN T. LEHR NE Bar No. 19248 Assistant United States Attorney District of Columbia Capitol Riot Detailee 555 Fourth Street, N.W. Washington, DC 20530 Susan.Lehr@usdoj.gov Phone (402) 661-3715 Case 1:21-cr-00133-JDB Document 17 Filed 08/18/21 Page 3 of 3

## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on August 10, 2021, I served a copy of this pleading on the

parties to this matter as indicated in the Court's Electronic Case Files system.

<u>/s/Susan T. Lehr</u> Assistant United States Attorney