UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

Case No. 21-cr-00488-CRC v.

NOAH S. BACON,

Defendant.

UNOPPOSED MOTION FOR PROTECTIVE ORDER

The United States of America hereby respectfully moves the Court for the entry of a protective order governing the production of discovery by the parties in the above-captioned case. The United States and counsel for Defendant have reached an agreement as to the proposed protective order. Therefore, the United States is authorized to represent to the Court that Defendant do not oppose this motion or the entry of the attached protective order.

Date: August 9, 2021 Respectfully submitted,

> CHANNING D. PHILLIPS Acting United States Attorney DC Bar No. 415793

By: s/ Monica A. Stump

MONICA A. STUMP PA Bar No. 90168

Assistant United States Attorney

District of Columbia Capitol Riot Detailee 555 4th Street, NW, Washington, D.C. 20530 Telephone No. (618) 622-3860

Monica.stump@usdoj.gov