

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

v.

DANIEL RODRIGUEZ,

Defendant.

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Case No. 21-cr-246 (ABJ)

MOTION FOR AN ORDER TO DISCLOSE GRAND JURY MATERIALS

The United States of America, by and through its undersigned attorneys, respectfully moves for entry by this Court of an order permitting the disclosure of certain Grand Jury transcripts and records obtained pursuant to Grand Jury subpoenas to the defendant, Daniel Rodriguez, and his defense counsel.

The government seeks a court order permitting the disclosure of these materials in so far as such disclosure is necessary for the government to comply with its discovery obligations. Under Federal Rule of Criminal Procedure 6(e)(3)(E)(i): “The court may authorize disclosure—at a time, in a manner, and subject to any other conditions that it directs—of a grand-jury matter: (i) preliminarily to or in connection with a judicial proceeding.” Rule 6(e)(3)(F) provides certain requirements for a petition under Rule 6(e)(3)(E)(i), including that the petition be filed in the district where the grand jury convened and that the court “must afford a reasonable opportunity to appear and be heard to: (i) an attorney for the government; (ii) the parties to the judicial proceeding; and (iii) any other person whom the court may designate.” The government submits that the requirements of Rule 6(e)(3)(F) are satisfied by this motion. The government further submits that such an order is appropriate because some grand jury testimony and records in this case constitute

material to which the defendants are entitled as part of their discovery.

Accordingly, the government respectfully requests an order authorizing the disclosure of grand jury testimony and records to the defendants and their counsel. *See* Rule 6(e)(3)(E)(i).

Respectfully submitted,

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Case No. 21-cr-246 (ABJ)

ORDER GRANTING LEAVE TO DISCLOSE GRAND JURY MATERIALS

Having received the government’s Motion For an Order to Disclose Grand Jury Materials, in which the government seeks leave from the Court to provide the defense with copies of certain records obtained pursuant to Grand Jury subpoenas and Grand Jury transcripts, in so far as such disclosure is necessary for the government to comply with its discovery obligations, IT IS HEREBY ORDERED THAT:

Pursuant to Federal Rule of Criminal Procedure 6(e)(3), the Court authorizes the government to disclose transcripts and other materials relating to the testimony of witnesses before the grand jury that returned the indictment in the instant case.

SO ORDERED this ____ day of _____, 2021.

HON. AMY BERMAN JACKSON
UNITED STATES DISTRICT COURT