

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

<b>UNITED STATES OF AMERICA</b>	:	
	:	
v.	:	<b>Crim. No. 1:21-cr-00034-CRC</b>
	:	
<b>THOMAS ROBERTSON and</b>	:	
<b>JACOB FRACKER</b>	:	
	:	
<b>Defendant.</b>	:	

**UNITED STATES’ MOTION TO WITHDRAW DOCUMENT**

The United States of America hereby moves this Court for leave to withdraw its prior Motion for Protective Order [Dkt. # 18], filed on February 25, 2021. As discussed at the defendants’ arraignment on February 25, 2021, the U.S. Attorney’s Office for the District of Columbia intends to seek a uniform protective order governing discovery in all of the cases arising from the riot at the U.S. Capitol on January 6, 2021. In the time since the United States filed its proposed protective order in this case, additional considerations have been brought to the Government’s attention that require modifications to the proposed order. Because of this, the United States respectfully requests leave from the Court to withdraw the proposed protective order that was attached to its February 25, 2021, motion. The United States is working to timely modify the proposed protective order so that it does not unduly delay discovery.

The United States notified defense counsel prior to filing this motion, and will provide defense counsel with the Government’s revised proposed protective order prior to re-filing a motion with the Court.

WHEREFORE, the Government respectfully requests leave from the Court to withdraw its Motion for Protective Order [Dkt. # 18].

Dated: March 1, 2021

Respectfully submitted,

MICHAEL R. SHERWIN  
Acting United States Attorney

By: /s/ Elizabeth Aloi  
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**CERTIFICATE OF SERVICE**

I hereby certify that on March 1, 2021, I sent a copy of the foregoing via the Court's ECF system to Bernard Crane, Esq., and Mark Rollins, Esq., counsel for defendants.

*/s/Elizabeth Aloi* \_\_\_\_\_

Elizabeth Aloi

Assistant United States Attorney