

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

|                                 |   |                               |
|---------------------------------|---|-------------------------------|
| <b>UNITED STATES OF AMERICA</b> | : |                               |
|                                 | : | <b>CASE NO. 21-cr-236-JDB</b> |
| <b>v.</b>                       | : |                               |
|                                 | : |                               |
| <b>FEDERICO KLEIN</b>           | : |                               |
|                                 | : |                               |
| <b>Defendant.</b>               | : |                               |

**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 has conferred with counsel for the defendant regarding this motion and counsel does not oppose this motion.

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

By: /s/ Jocelyn Bond  
Jocelyn Bond  
Assistant United States Attorney  
D.C. Bar No. 1008904  
555 4th Street, N.W.,  
Washington, D.C. 20530  
202-809-0793  
Jocelyn.Bond@usdoj.gov

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| <b>FEDERICO KLEIN</b>           | : |                               |
|                                 | : |                               |
| <b>Defendant.</b>               | : |                               |

**ORDER**

Upon consideration of the United States' motion to disclose items protected by Federal Rule of Criminal Procedure 6(e) and sealed materials, it is hereby

ORDERED, that the motion is GRANTED, and it is further

ORDERED, that the United States may provide in discovery materials protected by Federal Rule of Criminal Procedure 6(e), and it is further

ORDERED, that the United States may provide in discovery sealed materials, pursuant to the previously entered protective order governing discovery, and it is further

ORDERED, that this Order also applies to the disclosure of the materials described above to any co-defendants who may later be joined.

Date:

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HONORABLE JUDGE JOHN D. BATES  
United States District Judge