

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

<b>UNITED STATES OF AMERICA</b>	:	
	:	<b>CASE NO. 21-CR-512-PLF</b>
<b>v.</b>	:	
	:	
<b>MATTHEW THOMAS PURSE</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 conferred with counsel for the defendant regarding this motion and defendant assents to 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/ Lucy Sun  
Lucy Sun  
Assistant United States Attorney  
Massachusetts Bar Number 691766  
United States Attorney's Office  
Detailee – Federal Major Crimes  
555 Fourth Street, N.W.  
Washington, D.C. 20530  
Telephone: (617) 590-9468  
Email: lucy.sun@usdoj.gov