

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

<b>UNITED STATES OF AMERICA</b>	:	
	:	
v.	:	<b>Criminal No. 21-CR-411 (APM)</b>
	:	
<b>STEWART PARKS,</b>	:	
<b>MATTHEW BAGGOTT,</b>	:	
	:	
<b>Defendants.</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. The government also respectfully requests that this order apply to any co-defendants who may be joined.

The United States conferred with counsel for each defendant regarding this motion. Both counsel indicated that the United States may file unopposed.

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/ Benet J. Kearney            
BENET J. KEARNEY  
Assistant United States Attorney  
NY Bar No. 4774048  
1 Saint Andrew's Plaza  
New York New York 10007  
Benet.Kearney@usdoj.gov  
(212) 637 2260