UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

:

v.

JOSEPH DANIEL HUTCHINSON III, : CASE NO. 21 Cr. 447 (CJN)

JOSHUA CHRISTOPHER DOOLIN, :

MICHAEL STEVEN PERKINS, and : OLIVIA MICHELE POLLOCK, :

:

Defendants. :

UNITED STATES' MOTION FOR PROTECTIVE ORDER

The United States of America hereby respectfully moves the Court for the entry of a protective order governing the production of discovery by the parties in the above-captioned case. The United States and counsel for the Defendants previously reached an agreement as to the proposed protective order. On August 9, 2021, the Court denied, without prejudice, the United States' motion to enter that protective order on the grounds that paragraph 4.d conflicted with Local Rule of Criminal Procedure 49(f)(6)(i). The United States has now revised that paragraph to remove such conflict and respectfully requests that the attached protective order be entered. Counsel for Joseph Hutchinson, Joshua Doolin, and Michael Perkins do not object to the entry of

the revised protective order. Counsel for Oliva Pollock has not indicated her position regarding the request.

Respectfully submitted,

CHANNING D. PHILLIPS Acting United States Attorney DC Bar No. 415793

By: /s/

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