

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

UNITED STATES OF AMERICA	:	
	:	CASE NO. 21-cr-282 (TSC)
v.	:	
	:	
GRAYSON SHERRILL,	:	
ELIAS IRIZARRY,	:	
ELLIOT BISHAI,	:	
	:	
Defendants.	:	

**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 attempted to confer with Defense counsel for all defendants regarding this motion by emailing all Defense counsel copies of the proposed motion on October 15, 2021. In that email, the United States asked whether Defense counsel opposed the motion and stated that once the order accompanying the motion is in place, the United States will disclose voluminous discovery to Defense counsel (in addition to the discovery the United States has already provided). Defense counsel did not reply to the United States.

CERTIFICATE OF SERVICE

On October 19, 2021, a copy of the foregoing was served on counsel of record for the defendants via the Court's Electronic Filing System.

/s/ Grace Albinson
GRACE ALBINSON
Trial Attorney
Capitol Riot Detailee