

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

v.

CINDY FITCHETT,
MICHAEL CURZIO,
DOUGLAS SWEET,
TERRY BROWN,
BRADLEY RUKSTALES, and
THOMAS GALLAGHER,
Defendants.

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Case No. 21-CR-41(CJN)

**UNOPPOSED 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), if applicable to this case. 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 defendants regarding this motion and counsel do not oppose the motion.

