

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

v.

KATHERINE STAVELEY SCHWAB

Defendant.

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: Case No. 1:21-cr-50-CRC
: The Hon. Cristopher R. Cooper
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UNOPPOSED MOTION TO DISCLOSE DEFENDANT’S MEDICAL RECORDS TO DEFENSE COUNSEL

COMES NOW the defendant, Katherine Staveley Schwab, by and through counsel, Jeffrey Zimmerman, and files this unopposed to motion to disclose a copy of her medical. In support of the motion, Defendant states as follows:

- 1. On August 18, 2022, pursuant to a written plea agreement, Defendant Katherine Schwab pled guilty to one count of Engaging in Disruptive or Disorderly Conduct in a Restricted Building, in violation of 18 USC §1752(a)(2). Her sentencing is set for December 9, 2022.
2. As part of her plea agreement, a draft Presentence Investigation Report has been prepared by the Probation Office. See Presentence Investigation Report [ECF 85] [hereinafter PSR]. As part of this process, Ms. Schwab signed a waiver allowing the Probation Office to obtain her medical records.
3. The draft PSR describes information contained in her medical records. The defense believes that the medical records themselves may not be entirely accurate. In order to fully and fairly respond to the draft PSR, and to provide the Court with accurate information about her medical history, Ms. Schwab requests that she and undersigned defense counsel be provided a copy of the medical records that were provided to the Probation Office.

4. United States Probation Officer Hana Field has advised defense counsel that she cannot disclose these records to defense counsel unless ordered to do by the Court.

5. The United States, through Assistant United States Attorney Karen Rochlin, does not oppose this motion.

WHEREFORE, PREMISES CONSIDERED, the Defendant requests that this unopposed motion for disclosure of her medical records to defendant and defense counsel be granted.

Respectfully Submitted,

KATHERINE STAVELEY SCHWAB  
By Counsel

\_\_\_\_\_/s/  
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*Counsel for Katherine Schwab*

#### **CERTIFICATE OF SERVICE**

I hereby certify that on this 16th day of November 2022, a true and accurate copy of the foregoing was electronically filed and served via the Court's CM/ECF system to all counsel of record. In addition, a copy was served via email on United States Probation Officer Hana Field.

\_\_\_\_\_/s/  
JEFFREY D. ZIMMERMAN