

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

**UNITED STATES OF AMERICA**

**v.**

**JEFFREY SABOL,  
PETER FRANCIS STAGER,  
MICHAEL J. LOPATIC SR.,  
CLAYTON RAY MULLINS,  
JACK WADE WHITTON,**

**Defendants.**

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**Criminal No. 21-CR-35 (EGS)**

**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 defendants Sabol, Stager, Lopatic, Mullins, and Whitton regarding this motion. Counsel for defendants Sabol, Stager, Mullins and Whitton indicated that the United States may file unopposed; counsel for Lopatic did not express a position on the motion.

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/ Colleen D. Kukowski  
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**ORDER**

Upon consideration of the United States' motion to disclose items protected by Federal Rule of Criminal Procedure 6(e) and sealed materials, it is hereby

ORDERED, that the motion is GRANTED, and it is further

ORDERED, that the United States may provide in discovery materials protected by Federal Rule of Criminal Procedure 6(e), and it is further

ORDERED, that the United States may provide in discovery sealed materials, pursuant to the previously entered protective order governing discovery, and it is further

ORDERED, that this Order also applies to the disclosure of the materials described above to any co-defendants who may later be joined.

Date:

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EMMET G. SULLIVAN  
UNITED STATES DISTRICT JUDGE