

**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
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