

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

UNITED STATES OF AMERICA

v.

TAM PHAM,

Defendant.

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Case No. 21-cr-109 (TJK)

**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). The United States also requests permission to provide in discovery sealed materials. Finally, the United States requests that any order granting this motion be made applicable to co-defendants who may later be joined. Nothing in this motion should be construed to expand the discovery obligations of the United States beyond those already required by law.

The United States has conferred with counsel for the defendant regarding this motion and said counsel does not oppose the motion.

WHEREFORE, the United States respectfully requests an order authorizing the disclosure in discovery of the materials described above.

This 13th day of October, 2021.

Respectfully submitted,

CHANNING PHILLIPS
Acting United States Attorney
D.C. Bar No. 415793

By: /s/ Alison B. Prout
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Certificate of Service

The United States Attorney's Office served this document today by filing it using the Court's CM/ECF system, which automatically notifies the parties and counsel of record.

October 13, 2021

/s/ ALISON B. PROUT

ALISON B. PROUT

Assistant United States Attorney