

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

UNITED STATES OF AMERICA	:	
	:	
v.	:	CASE NO. 21-cr-540 PLF
	:	
TIMOTHY ALLEN HART.	:	
	:	
<i>Defendants.</i>	:	

**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 defendant regarding this motion and counsel does not oppose 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/ Mitra Jafary-Hariri
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on September 8, 2021, I served a copy of this pleading on defendant's counsel through the electronic case file system.

/s/ Mitra Jafary-Hariri
MITRA JAFARY-HARIRI
Assistant United States Attorney
Detailee