

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

<b>UNITED STATES OF AMERICA</b>	:	
	:	
v.	:	<b>CASE NO. 21-cr-615 PLF</b>
	:	
<b>STEVEN THURLOW,</b>	:	
	:	
<i>Defendant.</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.



**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on November 4, 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