

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

<b>UNITED STATES OF AMERICA</b>	:	
	:	
v.	:	<b>Case No. 21-cr-643-CKK</b>
	:	
<b>MEGHAN RUTLEDGE, and</b>	:	
<b>WILLARD THOMAS BOSTIC, JR.</b>	:	
aka "TOM BOSTIC"	:	
aka "WILLIAM THOMAS	:	
<b>BOSTIC, JR."</b>	:	
	:	
<b>Defendants.</b>	:	

**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. 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 Meghan Rutledge regarding this motion and that defendant does not oppose this motion. Defendant Willard Thomas Bostic, Jr. has not retained nor been assigned counsel for representation in this Court on this case as of this filing. Therefore, Defendant Bostic's position on this matter is unknown.

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

Respectfully submitted,

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