

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA :
 :
 v. : CASE NO. 1:21-cr-599 (RBW)
 :
 :
 DONNIE DUANE WREN, and :
 THOMAS HARLEN SMITH, :
 :
 :
 Defendants. :

UNOPPOSED MOTION FOR PROTECTIVE ORDER

The United States of America hereby respectfully moves the Court for the entry of a protective order governing the production of discovery by the parties in the above-captioned case. The United States and counsel for the defendant have reached an agreement as to the proposed protective order.¹ Therefore, the United States is authorized to represent to the Court that the defendants do not oppose this motion or the entry of the attached protective order.

Respectfully submitted,

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D.C. Bar Number 481052

By: /s/ Michael J. Romano
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¹ This agreement was reached near the inception of the case but, through oversight, government counsel failed to file this motion. It was agreed to by each defendant, counsel for defendant Smith, and prior counsel for Mr. Wren. The government has spoken with Mr. Wren's new counsel, who has confirmed that he agrees to it as well.