

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

<b>UNITED STATES OF AMERICA</b>	:	
	:	
v.	:	<b>Case No. 21-mj-672-1</b>
	:	
<b>Ronald Loehrke,</b>	:	
<b>Defendant.</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 protective order regarding discovery that the parties hope the Court will sign contemporaneously with the proposed order attached hereto. Finally, the United States requests that any order granting this motion be made applicable to co-defendants who may later be joined.<sup>1</sup>

The United States conferred with counsel for the defendant regarding this motion and counsel for defendant Loehrke has represented to undersigned counsel that he does not oppose the government’s requested relief in this motion.

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<sup>1</sup> This defendant already has a co-defendant, James Haffner, whose counsel is awaiting admission to the bar of this court. Once Mr. Haffner’s counsel enters an appearance, the government will seek counsel’s position on whether this order should apply to Mr. Haffner as well and file a motion accordingly.

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

Respectfully submitted,

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