

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

<b>UNITED STATES OF AMERICA</b>	:	
	:	
v.	:	
	:	<b>CRIMINAL NO.: 1:22-CR-89</b>
<b>NANCY BARRON,</b>	:	
	:	
<b>Defendant.</b>	:	

**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 codefendants who may later be joined.

The United States conferred with defendant’s counsel 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,

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By: /s/ Justin M. Woodard  
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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on April 6th, 2022, I served a copy of this pleading on the parties to this matter as indicated in the Court's Electronic Case Files system.

*/s/ Justin M. Woodard*  
Trial Attorney