

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA	:	
	:	CASE NO. 21-CR-743 (FYP)
v.	:	
	:	
THOMAS PAUL CONOVER,	:	
	:	
Defendant.	:	

**UNOPPOSED MOTION FOR AN ORDER TO DISCLOSE ITEMS PROTECTED BY  
FEDERAL RULE OF CRIMINAL PROCEDURE 6(e) AND SEALED MATERIALS**

The United States respectfully moves for entry by this Court of an order permitting the disclosure in discovery of materials protected by Fed. R. Crim. P. 6(e). The government also requests permission to provide in discovery sealed materials, pursuant to the previously entered protective order governing discovery. Finally, the government 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 defense counsel indicated that the motion may be filed as unopposed.

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

Respectfully submitted,

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