

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

UNITED STATES OF AMERICA	:	
	:	
v.	:	CASE NO. 22 CR 139 (RCL)
	:	
CALE DOUGLAS CLAYTON,	:	
	:	
Defendant.	:	

**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 regarding this motion and they do not object to this motion.

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

Respectfully submitted,
MATTHEW M. GRAVES
UNITED STATES ATTORNEY
D.C. Bar Number 481052

By: /s/ BARRY K. DISNEY
Barry K. Disney
Trial Attorney, Capital Case Section
Detailee – Capitol Siege Division

Kansas Bar No. 13284
U.S. Department of Justice
1331 F. St. NW, Suite 6000
Washington, D.C. 20005
202-305-4367 (office)
202-924-4861 (cell)
Barry.Disney@usdoj.gov