

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

UNITED STATES OF AMERICA	:	
	:	
v.	:	CASE NO. 22-CR-111 (JEB)
	:	
CHARLES HAND, III, and	:	
MANDY ROBINSON-HAND,	:	
	:	
Defendants.	:	

**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). The United States also requests permission to provide in discovery sealed materials. Finally, the United States requests that any order granting this motion be made applicable to co-defendants who may later be joined. Nothing in this motion should be construed to expand the discovery obligations of the United States beyond those already required by law.

The United States has conferred with counsel for the defendants regarding this motion and said counsel do 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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