

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

UNITED STATES OF AMERICA	:	
	:	
v.	:	Case No. 21-CR-692 (CKK)
	:	
D-1 THOMAS FASSELL,	:	
	:	
D-2 MARILYN FASSELL,	:	
	:	
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), 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 co-defendants who may later be joined.

The United States conferred with counsel for the defendants regarding this motion and neither counsel opposes the 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 No. 481052

/s/ Amanda Jawad

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on December 9, 2021, I served a copy of this pleading on defendants' counsel through the electronic case file system.

/s/ Amanda Jawad

AMANDA JAWAD

Assistant United States Attorney, Detailee