

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

| | | |
|---------------------------------|---|-----------------------------------|
| UNITED STATES OF AMERICA | : | |
| | : | |
| v. | : | Case No. 21-cr-623-2 (CRC) |
| | : | |
| KIRSTYN NIEMELA, | : | |
| | : | |
| Defendant. | : | |

UNOPPOSED MOTION FOR PROTECTIVE ORDER

The United States of America hereby respectfully moves the Court for the entry of a protective order governing the production of discovery by the parties in the above-captioned case. As the United States and counsel for Defendant have reached an agreement as to the proposed protective order, the United States is authorized to represent to the Court that Defendant does not oppose this motion or the entry of the attached protective order.¹

Respectfully submitted,

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

By: /s/ Jessica Arco
JESSICA ARCO
Trial Attorney-Detailee
D.C. Bar No. 1035204
601 D St., NW
Washington, D.C. 20530
jessica.arco@usdoj.gov
Telephone: 202-514-3204

¹ A protective order governing discovery was entered in a related matter before Judge Mehta, in which the Defendant was initially charged. *See* ECF No. 19, 22-cr-25-01 (APM). Because the docket for that case does not appear to be consolidated with this case following the Superseding Indictment, the parties move for entry of the protective order in an abundance of caution.