

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

UNITED STATES OF AMERICA	:	
	:	Case No: 21-CR-733 (CRC)
v.	:	
	:	
JEREMY K. BAUCHE,	:	
	:	
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 counsel does not oppose 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
DC Bar No. 481052

By: /s/ Susan T. Lehr
SUSAN T. LEHR
NE Bar No. 19248
Assistant United States Attorney
District of Columbia
Capitol Riot Detailee
555 Fourth Street, N.W.
Washington, DC 20530
Susan.Lehr@usdoj.gov
Phone (402) 661-3715

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on January 6, 2022, I served a copy of this pleading on the parties to this matter as indicated in the Court's Electronic Case Files system.

/s/Susan T. Lehr
Assistant United States Attorney