

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

UNITED STATES OF AMERICA	:	
	:	CASE NO. 22-MJ-194
v.	:	
	:	
BOBBY WAYNE RUSSELL,	:	
	:	
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 for the defendant does not oppose this 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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By: /s/ Grace Albinson
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CERTIFICATE OF SERVICE

On September 12, 2022, a copy of the foregoing was served on counsel of record for the defendants via the Court's Electronic Filing System and via email.

/s/ Grace Albinson
GRACE ALBINSON
Trial Attorney
Capitol Riot Detailee