

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

**UNITED STATES OF AMERICA**

v.

**WILLIAM MARTY BIERBRODT,**

**Defendant.**

:  
:  
:  
:  
:  
:  
:  
:

**Case No. 23-cr-0180 (RMM)**

**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. The United States and counsel for Defendant have reached an agreement as to the proposed protective order. Therefore, 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.

Respectfully submitted,

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

By:

/s/

\_\_\_\_\_  
Jack E. Burkhead  
Assistant United States Attorney  
NM Bar No. 10493  
555 Fourth Street, N.W.,  
Washington, DC 20530  
jack.e.burkhead@usdoj.gov  
505-224-1434