

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

UNITED STATES OF AMERICA	:	
	:	
v.	:	Case No. 21-cr-437-APM
	:	
MARK GRODS,	:	
	:	
Defendant.	:	

**MOTION FOR AN ORDER TO DISCLOSE ITEMS PROTECTED BY
FEDERAL RULE OF CRIMINAL PROCEDURE 6(e) AND SEALED MATERIALS**

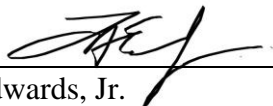
The United States of America respectfully moves for entry by this Court of an order permitting the disclosure in discovery of materials protected by Federal Rule of Criminal Procedure 6(e). The United States also requests permission to provide in discovery sealed materials, pursuant to the previously 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 is authorized to represent to the Court that Defendant does not oppose this motion or the entry of the attached order.

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 Number 481052

By: 

 Troy A. Edwards, Jr.
 Assistant United States Attorney
 N.Y. Bar No. 5453741

Ahmed M. Baset
Louis Manzo
Jeffrey S. Nestler
Kathryn Rakoczy
Assistant United States Attorneys
U.S. Attorney's Office for the District of Columbia
555 4th Street, N.W.
Washington, D.C. 20530

/s/ Alexandra Hughes

Alexandra Hughes
Justin Sher
Trial Attorneys
National Security Division
United States Department of Justice
950 Pennsylvania Avenue NW
Washington, D.C. 20004