

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

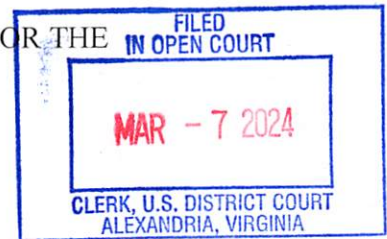
UNITED STATES OF AMERICA

v.

CRAIG DAVID DAVIS,

Defendant.

Case No. 1:24-CR-40 (PTG)



CONSENT MOTION FOR ENTRY OF A STIPULATED PROTECTIVE ORDER

The United States of America, by and through undersigned counsel, respectfully moves this Honorable Court for entry of the attached stipulated Protective Order, pursuant to Federal Rule of Criminal Procedure 16(d)(1) and Federal Rule of Evidence 502(d). Counsel for the defendant has reviewed the proposed protective order and advised that the defendant does not oppose this Motion. In support thereof, the United States submits the following:

1. During the course of the investigation, the United States has gathered or generated voluminous documents, including electronic records, which contain confidential information and personal identifiers for the defendants, unindicted co-conspirators, and non-parties in this case. These documents and electronic records currently include and are anticipated to include, but are not limited to, bank records, law enforcement investigative reports, information from a cooperating source, and other materials. The United States intends to produce these documents and electronic records, in accordance with the Federal Rules of Criminal Procedure, relevant case law, and any Discovery Orders that are agreed upon and entered in this case.

2. Accordingly, the proposed Protective Order regulates discovery in this case by restricting the use and dissemination of documents and electronic records obtained through

CERTIFICATE OF SERVICE

I hereby certify that on March 7th, 2024, I electronically filed the foregoing using the CM/ECF system, which will automatically send a notification of such filing to all counsel of record.

/s/

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