

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
NORTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

No. 2:23-cr-7

vs.

Hon. Robert J. Jonker
United States District Judge

NATHAN WEEDEN,

Defendant.

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MOTION FOR PROTECTIVE ORDER AND MEMORANDUM IN SUPPORT

May it please the Court, the United States of America moves for a protective order to limit the use and dissemination of discovery materials it will provide in this case. The reasons for the motion are set forth below.

At any time the Court may, for good cause, enter a protective order to restrict discovery or grant other appropriate relief. Fed. R. Crim. P. 16(d)(1).

The discovery material to be produced by the government in this case includes documents and records that contain personally identifiable information (“PII”), such as telephone numbers, dates of birth, and home addresses. Given the volume of materials to be produced in this case, item-by-item search for and redaction of all PII would be impractical, unduly burdensome, and time consuming. In addition, such redaction may impede the review and analysis of the discovery materials by defense counsel.

To promote the efficient and timely production of discovery material and to protect the confidentiality of PII contained within the discovery material, the

government respectfully requests an order providing that dissemination of the criminal discovery be limited to:

- (1) Members of the defense team (co-counsel, paralegals, investigators, litigation support personnel, the defendant, and secretarial staff);
- (2) Experts or consultants retained to assist in the preparation of the defense;
- (3) Potential witnesses interviewed by the defense team, if it is determined that it is necessary to share or display records to such witnesses for the purpose of preparing the defense of this criminal case; and
- (4) The Court in connection with proceedings in this case.

In order to prevent unauthorized re-dissemination, the government also requests the defense redact any copies of discovery materials provided to the defendant and other parties named above, except upon further order by this Court.

WHEREFORE, the government respectfully requests that this Court enter the attached proposed Order governing the production and dissemination of discovery material in this case.

Respectfully submitted,

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United States Attorney

Dated: July 11, 2023

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