

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

**UNITED STATES OF AMERICA**

**v.**

**THOMAS EDWARD CALDWEL,**

**DONOVAN RAY CROWL, and**

**JESSICA MARIE WATKINS,**

**Defendants.**

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**CRIMINAL NO. 21-cr-28 (APM)**

**MOTION FOR PROTECTIVE ORDER**

The United States of America, by and through its attorney, the United States Attorney for the District of Columbia, 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 has not been able to reach agreement with counsel for the defendants on this proposed protective order. Counsel for Mr. Caldwell opposes this protective order. To the knowledge of the government, counsel for Mr. Crowl and Ms. Watkins have not yet been appointed. As this case was indicted on January 27, 2021, however, the government would like to start providing discovery as soon as possible. Much of the discovery to be provided at this time consists of data from searches of cellular telephones and social media accounts. In order to turn over complete, unredacted versions of this data, the government is seeking the proposed protective order.

WHEREFORE, the government asks that this Court enter the proposed protective order.

Respectfully submitted,

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By: /s/ Kathryn L. Rakoczy

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/s/ Alexandra Hughes

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Dated: February 12, 2021

**CERTIFICATE OF SERVICE**

I hereby certify that on February 12, 2021, I sent a copy of the foregoing via the Court's electronic filing system to counsel for the defendants.

/s/ Kathryn L. Rakoczy  
Kathryn L. Rakoczy  
Assistant United States Attorney

