

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

v.

ROGER JASON STONE, JR.,

Defendant.

Crim. No. 19-018 (ABJ)

**UNOPPOSED MOTION FOR  
PROTECTIVE ORDER GOVERNING DISCOVERY**

Pursuant to Rule 16(d) of the Federal Rules of Criminal Procedure, the United States of America, by and through Special Counsel Robert S. Mueller, III, hereby moves for entry by this Court of a protective order that will ensure the confidentiality of personal identification information and discovery that are included within the materials to be produced by the government pursuant to its discovery obligations.

Entry of a protective order restricting the use, dissemination, and disposition of such documents is essential to permit the United States to provide discovery to the defendant while protecting, among other things, personal information and other confidential materials. The United States has conferred with counsel for the defendant, Roger J. Stone, Jr., and the defendant consents to the proposed Protective Order, a copy of which is submitted with this application.

WHEREFORE, the government respectfully moves the Court to enter the proposed Protective Order Governing Discovery.

Respectfully submitted,

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Special Counsel

JESSIE K. LIU  
United States Attorney

By: /s/Aaron Zelinsky

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Dated: January 31, 2019