## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND NORTHERN DIVISION

UNITED STATES OF AMERICA \*

\*

v. \* Case No. RDB 10 CR 1081

\*

THOMAS ANDREWS DRAKE,

\*

Defendant.

\*\*\*\*\*

### JOINT MOTION FOR PROTECTIVE ORDER

The parties, through counsel undersigned, pursuant to Fed. R. Crim. P. 16(d), and in light of the sensitive nature of the materials which may be disclosed in this case, stipulate to a protective order as to certain categories of discovery. This protective order only covers unclassified materials. The parties acknowledge and understand that this request for a protective order does not apply to classified materials, and that the handling and protection of classified materials must be addressed separately pursuant to the Classified Information Procedures Act (CIPA).

A copy of the Protective Order to which the parties have agreed and stipulated is attached.

Respectfully submitted this 29th day of April, 2010.

For the United States:

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# **CERTIFICATE OF SERVICE**

I hereby certify that I have caused an electronic copy of the *Motion for Protective Order* to be served via ECF upon James Wyda and Deborah L. Boardman, counsel for defendant Drake.

/s/ William M. Welch II
Senior Litigation Counsel
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