

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
BIG STONE GAP DIVISION

CLERK'S OFFICE U.S. DIST. COURT  
AT ABINGDON, VA  
FILED

AUG 29 2007

JOHN F. CORCORAN, CLERK  
BY:  DEPUTY CLERK

UNITED STATES OF AMERICA )

v. )

DANIEL DOVE )

Case No.: 2:07CR15

MOTION FOR VOLUNTARY DISCLOSURE OF GRAND JURY AND  
OTHER MATERIALS AND FOR LIMITATIONS ON FURTHER DISCLOSURE

The United States, by counsel, moves pursuant to Federal Rules of Criminal Procedure 6(e), 16, and 26.2, pursuant to 26 U.S.C. §§ 6103(h)(4)(D) and (i)(4)(A), and pursuant to the authority of this Court to regulate proceedings before it, that the United States be permitted to disclose to counsel for the defense as part of voluntary discovery, grand jury, tax return, criminal histories, and other investigative materials. The United States also requests that the Court permit the United States and defense counsel to use this material for the prosecution and defense of the case, respectively, and to make such further disclosures as may be necessary for, and for the sole purpose of, prosecuting and defending this case. The United States submits the accompanying proposed Order in the interest of both advancing the case and protecting the secrecy of grand jury, tax return, criminal histories, and other investigative materials. The attached proposed order would prevent the unauthorized dissemination of materials voluntarily provided by the United States and would provide notice of sanctions in the event these materials were deliberately disclosed in an unauthorized manner or to unauthorized persons.

Respectfully submitted,

JOHN L. BROWNLEE  
United States Attorney

  
Randy Ramseyer

Assistant United States Attorney