UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

United States of America	:	
V.	:	Case No. 1:21-cr-291-ABJ
Kyle J. Young,	:	
Defendant.	:	

DEFENDANT KYLE YOUNG'S NOTICE REGARDING MOTIONS AND SCHEDULING

Comes Now Defendant Kyle Young, by and through counsel, with this Notice regarding the Court's January 4, 2022, Minute Order, and states as follows:

Defendant Kyle Young does intend to file a motion to dismiss and a motion to sever in this matter. As evidence continues to be produced, Defendant may also file a motion to suppress statements or evidence as appropriate. After consultation with the Government, Defendant proposes that the Court order that (i) Defendant file any such motion within 60 days; (ii) the Government have two weeks to answer any motion; and (iii) Defendant have a week to reply to any answer.

The 60-day timeline to file these motions is based on the on-going discovery process,

Defendant's detention and the practical challenges of sharing discovery with Defendant, and the on-going resolution discussions between the Government and Defendant. The extended timeline may facilitate these on-going discussions and allow the parties to narrow-in the need for pre-trial motions.

Dated: January 11, 2022

Respectfully Submitted,

/s/ Samuel C. Moore District of Columbia Bar ID: 1015060 Law Office of Samuel C. Moore, PLLC 526 King St., Suite 506 Alexandria, VA 22314 Email: scmoore@scmoorelaw.com Phone: 703-535-7809 Fax: 571-223-5234

CERTIFICATE OF SERVICE

I hereby certify that on the 11th day of January, 2022, I will electronically file the

foregoing Notice Regarding Minute Order with the Clerk of Court using the CM/ECF system,

which will then send a notification of such filing (NEF) to the following:

Cara A. Gardner Tara Ravindra Assistant United States Attorneys United States Attorney's Office 555 4th Street, NW Washington, DC 20530

/s/

Samuel C. Moore District of Columbia Bar ID: 1015060 Law Office of Samuel C. Moore, PLLC 526 King St., Suite 506 Alexandria, VA 22314 Email: scmoore@scmoorelaw.com Phone: 703-535-7809 Fax: 571-223-5234