

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

UNITED STATES OF AMERICA)	
)	
v.)	Criminal Action No. 21-575 (JDB)
)	
DAVID JOHN LESPERANCE,)	
CASEY CUSICK, and JAMES)	
VARNELL CUSICK, JR.,)	
)	
Defendants.)	

**DEFENDANT’S MOTION TO ALLOW
THE UNDERSIGNED ATTORNEY TO PARTICIPATE VIA ZOOM**

Defendants, Lesperance, Cusick, and Cusick, by and through undersigned counsel John Pierce, hereby submits this motion in response to the Court’s Order filed on June 29, 2023. The undersigned requests the court to allow co-counsel Roger Roots, who is still pending admission to participate by Zoom for the pretrial conference, scheduled for July 6, 2023.

As grounds for the motion, Roger Roots is unable to appear in person, because of traveling to North Carolina for a surgical procedure of his significant other. However, Roger Roots will be available and ready to appear at the pretrial conference via zoom if the Court allows. Should the Court deny the Defendants’ motion, the attorney (awaiting admission) Roger Roots would request to be able to call into the pretrial conference, with undersigned counsel John Pierce being present in court.

WHEREFORE, Defendants Lesperance, Cusick, and Cusick, respectfully requests this Court to grant said relief and allow co-counsel Roger Roots to appear via Zoom due to upcoming travel related to a medical procedure.

Date: June 29, 2023

Respectfully Submitted,

*/s/ John M. Pierce
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Attorney for Defendants

CERTIFICATE OF SERVICE

I, John M. Pierce, hereby certify that on this day, June 29, 2023, I caused a copy of the foregoing document to be served on all counsel through the Court's CM/ECF case filing system.

/s/ John M. Pierce
John M. Pierce