UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA :

:

v. : Case No. 21-cr-28 (APM)

:

KENNETH HARRELSON

:

Defendant.

:

MOTION TO ADOPT MOTIONS OF CO-DEFENDANTS

Kenneth Harrelson, by counsel, respectfully requests this Court allow him to join the motions of the following Defendants:

<u>Defendant</u>	<u>Motion</u>
Thomas E. Caldwell	Motion to Dismiss Counts 1 and 2 of the Indictment
Thomas E. Caldwell	Motion to Transfer Venue
Joshua James	Motion to Dismiss Count 8 and Portions of Count 13 of the Indictment
Joshua James	Motion for Bill of Particular

To the extent that the motions are fact-specific to one defendant, the legal analysis applies equally to all defendants if granted. Further, it is in the interest of judicial economy to grant this motion.

Respectfully submitted,

KENNETH HARRELSON

By Counsel

/s/

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CERTIFICATE OF SERVICE

I hereby certify that on this 1st day of July 2021, a true and accurate copy of the foregoing was electronically filed and served via the Court's CM/ECF system to all counsel of record.

/s/ NINA J. GINSBERG

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v.	:	Case No. 21-cr-28 (APM)
	:	
KENNETH HARRELSON	:	
	:	
Defendant	•	

PROPOSED ORDER

Kenneth Harrelson's Motion to Adopt Co-Defendants Thomas E. Caldwell's Motion to Dismiss Counts 1 and 2 of the Indictment; Thomas E. Caldwell's Motion to Transfer Venue; Joshua James' Motion to Dismiss Count 8 and Portions of Count 13 of the Indictment; and Joshua James' Motion for Bill of Particular is hereby granted.

Dated:	
	 HONORABLE JUDGE AMIT P. MEHTA