UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA	:	
v.	:	Criminal No. 21-cr-90
NATHANIEL DEGRAVE	:	Judge Friedman

DEFENDANT NATHANIEL DEGRAVE'S
OPPOSITION TO GOVERNMENT'S EMAIL PROFFER OF ADDITIONAL VIDEOS

Defendant Nathaniel DeGrave, through undersigned counsel, respectfully opposes introduction of additional videos which the government emailed for the Court at the time it submitted its pleading today.

Undersigned counsel has not had an opportunity to review the videos. It was counsel's understanding that the government would not introduce segments from videos that it had only produced for the defense during this week. While the government has apparently had these videos for weeks, it has only released them to the defense this week, and just decided to submit clips this morning. This makes the government's position a moving target which is impossible for the defense to anticipate, much less answer. Counsel cannot consult and review this material with Mr. DeGrave prior to Monday's hearing. Particularly for a decision as crucial as liberty, the submission of these tapes does not allow for fundamental fairness to the defense.

Respectfully submitted,

/s/

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