

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

UNITED STATES OF AMERICA, :
:
v. : **Case No. 1:21-cr-0091-RCL-01**
:
CRAIG MICHAEL BINGERT, et al. :
Defendant. :

**DEFENDANT CRAIG MICHAEL BINGERT'S
MOTION TO ADOPT, JOIN AND CONFORM**

COMES NOW defendant Craig Michael Bingert, by and through his undersigned counsel, Allen H. Orenberg, Esquire, and hereby respectfully moves this Court for the entry of an Order granting leave to adopt, join and conform each and every motion, objection, petition, or other applications for relief, including those made at any pretrial motion's hearing and at trial, made by or filed on behalf of his co-defendants in this prosecution, as they may in any way relate to Mr. Bingert, with the exception of motions for continuance and waivers of speedy trial rights, and with the exception of any motions, objections, petitions, or other applications for relief which Mr. Bingert, through counsel, expressly declines to join or adopt, i.e., from which he "opts out."

The facts set forth in co-defendant motions' are equally and specifically applicable to Mr. Bingert in this prosecution. The legal arguments and authorities set forth in co-defendant motions are those which Mr. Bingert would have cited, had he filed separate motions. It would be entirely duplicative for this defendant to expend compensable and considerable time preparing and filing many motions

which would be identical to the motions filed by co-defendants.

WHEREFORE, for the foregoing reasons and such other reasons that may appear just and proper, defendant Craig Michael Bingert respectfully requests moves that all objections, exceptions, motions and other applications for relief made during any phase of this prosecution, including those made at any pretrial motion's hearing and at trial, by any of the co-defendants through counsel inure to his benefit and be treated as if defendant Bingert, through undersigned counsel, had made them.

Respectfully submitted,

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Counsel for Craig Michael Bingert

Dated: May 1, 2023

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ORDER

Upon consideration of the motion for joinder filed by defendant Craig Michael Bingert, and for good cause shown, it is hereby this _____ day of May, 2023, the motion is GRANTED.

Defendant, Craig Michael Bingert, is permitted leave of Court to Adopt, Join and Conform to all objections, exceptions, motions and other applications for relief made during any phase of this prosecution, including those made at any pretrial motion's hearing and at trial, by any of the co-defendants through counsel inure to his benefit and be treated as if defendant Bingert, through undersigned counsel, had made them, unless defendant Bingert specifically "opts-out."

Judge, U.S. District Court
for the District of Columbia