

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

| | | |
|----------------|---|----------------------|
| UNITED STATES, |) | |
| |) | |
| v. |) | Crim. No. 21cr40 |
| |) | Hon. Trevor McFadden |
| ROBERT MORSS, |) | |
| Defendant. |) | |

MOTION TO ADOPT, CONFORM AND SUPPLEMENT
MOTIONS TO DISMISS COUNTS ALLEGING VIOLATION OF 18 U.S.C. Sec. 1512(c)(2)

Comes now Defendant Robert Morss, by counsel, and respectfully requests that he be permitted to adopt, conform and enjoy the benefits (as relate to Count 34 of the Fourth Superseding Indictment) of those motions filed by defendants before this Court to dismiss counts alleging a violation of 18 U.S.C. Sec. 1512(c)(2). Said submissions include, without limitation, the motion, argument and related briefings tendered by defendants in United States v. Montgomery, *et al.*, DDC No. 1:21cr46 (RDM) (*see* ECF Nos. 39, 48, 53, 59, 60 and 66) as supplemented by defendant Brian Cua in United States v. Cua, DDC No. 1:21cr107(RDM) (*see* ECF No. 84).

Respectfully Submitted,

ROBERT MORSS
By Counsel

/s/
John C. Kiyonaga

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Counsel for the Defendant

Certificate of Electronic Service

I hereby certify that on November 17, 2021, I electronically filed the foregoing with the Clerk of Court using the CM/ECF System, with consequent service on all parties.

/s/
John C. Kiyonaga

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| ROBERT MORSS, |) | |
| Defendant. |) | |
| _____ |) | |

ORDER

Upon consideration of Defendant Robert Morss' Motion to Adopt, Conform and Supplement Motions to Dismiss Counts Alleging Violation of 18 U.S.C. Sec. 1512(c)(2), it is hereby ORDERED that the motion is GRANTED, and it is further

ORDERED that Defendant Morss is deemed to have adopted, conformed and shall enjoy the benefits (as relate to Count 34 of the Fourth Superseding Indictment) of those motions to include, without limitation, the motion, argument and related briefings tendered by defendants in United States v. Montgomery, *et al.*, DDC No. 1:21cr46 (RDM) (*see* ECF Nos. 39, 48, 53, 59, 60 and 66) as supplemented by defendant Brian Cua in United States v. Cua, DDC No. 1:21cr107(RDM) (*see* ECF No. 84). It is further

ORDERED that Defendant Morss may conform his case and particular circumstances to the aforesaid submissions.

Date: _____

HON. TREVOR N. McFADDEN
United States District Judge