

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

v.

Case No. 21-CR-175-2

JOSEPH RANDALL BIGGS,

Judge Timothy J. Kelly

Defendant.

**JOSEPH BIGGS' NOTICE OF JOINING NORDEAN'S RESPONSE TO
GOVERNMENT'S "NOTICE OF CORRESPONDENCE" AND NOTICE OF
CRITICAL INFORMATION RELEVANT TO BAIL PROCEEDINGS**

Defendant Joseph Biggs, by undersigned counsel, files this Notice of joining in all respects defendant Nordean's combined Response and Notice filed yesterday at ECF No. 174. Nordean's filing raises issues bearing on (A) the status conference and hearing on defendants' motions to dismiss scheduled for 11:00 AM on Tuesday, September 21 and (B) Bigg's and Nordean's motions to reopen April 6, 2021 detention hearing and for release now pending before the Court, and argued partially under seal on September 13. Further, in connection with either matter, Biggs would reserve the right to file any pertinent motion, ask for any appropriate relief or initiate any relevant inquiry, including but not limited to under the Due Process Protections Act.

Respectfully submitted,

J. DANIEL HULL
COUNSEL FOR DEFENDANT JOSEPH BIGGS

Dated: September 20, 2021

By: /s/ John Daniel Hull
J. DANIEL HULL, DC Bar No. 323006
Hull McGuire PC
1420 N Street, N.W.
Washington, D.C. 20005
202-429-6520
619-895-8336
jd Hull@hullmcguire.com

CERTIFICATE OF SERVICE

The undersigned certifies that on September 20, 2021, he served a true and correct copy of the forgoing Notice via Electronic Case Filing (ECF) system upon counsel for the government and all counsel of record.

By: /s/ John Daniel Hull
J. DANIEL HULL
DC Bar No. 323006
Hull McGuire PC
1420 N Street, N.W.
Washington, D.C. 20005
202-429-6520
619-895-8336
jd Hull@hullmcguire.com