

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

**UNITED STATES OF AMERICA** :  
 :  
 v. : **No. 21-CR-503 (RCL)**  
 :  
**GLENN BROOKS,** :  
 :  
 **Defendant.** :

**UNITED STATES’ MOTION TO FILE A SUR-REPLY IN OPPOSITION TO  
DEFENDANT GLENN BROOKS’ MOTION FOR CHANGE OF VENUE**

Defendant Glenn Brooks (“the defendant”) seeks the transfer of this case to the Central District of California where he resides. To that end, the defendant filed a Motion for Change of Venue on November 12, 2021. Dkt. 20. The government filed its opposition on the same day. Dkt. 21. On November 15, 2021, the defendant filed a reply brief in which he, for the first time, makes an argument regarding prejudice—that a Washington, D.C. jury and local appointed counsel would be biased, thus requiring transfer to the defendant’s home district. *See* Dkt. 23 at 4. To allow the government an opportunity to respond to this argument, the government requests leave to file the attached Sur-Reply in Opposition to Defendant’s Motion for Change of Venue. Atch. 1.

Respectfully submitted,

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