

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

| | | |
|---------------------------------|---|--------------------------------|
| UNITED STATES OF AMERICA | : | |
| | : | |
| v. | : | Case No: 21-CR-28 (APM) |
| | : | |
| JOSHUA JAMES, | : | |
| <i>Defendant</i> | : | |

**MOTION TO ADOPT DEFENDANT CALDWELL’S MOTION TO DISMISS COUNTS 1 and 2
OF THE INDICTMENT¹**

The Accused, Joshua James, through counsel, respectfully requests that the Court allow him to join Defendant Thomas Caldwell’s motion to dismiss counts 1 and 2 of the indictment. *See* docket entry 240. The motion and argument as to these two counts is not fact-specific to one defendant and applies equally to all defendants if granted. Further, it is in the interest of judicial economy to allow this motion.

Respectfully submitted,

/s/
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¹ Defendant Caldwell’s motion also challenges Counts 4 and 9. Mr. James does not seek to adopt the portions of Caldwell’s motion relating to counts 4 and 9, as Mr. James is not charged with Count 9 and he is not similarly situated as to Count 4. Concurrent with this filing, Mr. James has filed a separate motion to dismiss Counts 8 and 13 of the indictment, in which Mr. James is named as the sole defendant.

_____/s/_____
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CERTIFICATE OF SERVICE

I hereby certify that on the 1st day of July, 2021, I will electronically file the foregoing Notice with the Clerk of Court using the CM/ECF system, which will then send a notification of said filing (NEF) to counsel of record.

_____/s/_____
Joan Robin