

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

**UNITED STATES OF AMERICA**

v.

**ZACHARY REHL,  
Defendant**

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\*  
\*  
\*

**CASE NO: 1:21-cr-0175-3 (TJK)**

\*\*\*\*\*

**MOTION TO ADOPT MOTION OF CODEFENDANT NORDEAN**

Zachary Rehl, by his undersigned counsel, hereby respectfully moves for leave to adopt the Motion filed by Ethan Nordean on December 29, 2021 as well as Mr. Nordean's Reply filed on February 2, 2022 to the Government's Response in Opposition (ECF 283).

1. The above-noted Motion and Reply were filed Under Seal as they relate to "highly sensitive" discovery produced subject to the Protective Order at 3, ¶4(d) (ECF 83). Accordingly, counsel is not aware of their corresponding ECF numbers.<sup>1</sup>

2. Mr. Rehl seeks to join and adopt the legal arguments made and relief sought in said motion and reply. all motions filed by co-defendants unless he moves not to adopt and join a particular motion.

3. Mr. Rehl also seeks leave to supplement said motions with legal arguments and particularized facts pertinent to Mr. Rehl, once counsel has completed reviewing the discovery relevant to the issues presented in the motion.

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<sup>1</sup> Out of an abundance of caution, as the Motion was filed Under Seal counsel has not made reference to the title of the Motion.

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA UNITED STATES OF AMERICA \* \* v.  
 \* CASE NO: 1:21-cr-0175-3 (TJK) \* ZACHARY REHL, \* Defendant \* \*\*\*\*\* MOTION TO ADOPT MOTION OF  
 CODEFENDANT NORDEAN Zachary Rehl, by his undersigned counsel, hereby respectfully moves for leave to  
 adopt the Motion Piled by Eitan Nordean in on December 29, 2021 as well as Mr. Nordean's Reply filed on  
 February 2, 2022 to the Government's Response in Opposition (ECF 283). 1. The above-noted Motion and Reply  
 were filed Under Seal as they relate to "highly sensitive" discovery produced subject to the Protective Order at 3,  
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 supplement said motions with legal arguments and particularized facts pertinent to Mr. Rehl, once counsel has  
 completed reviewing the discovery relevant to the issues presented in the motion. 1 Out of an abundance of  
 caution, as the Motion was filed Under Seal counsel has not made reference to the title of the Motion. 4.  
 Proceeding in this fashion will promote the just determination of the case, simplify procedures and eliminate  
 unjustifiable expense and delay in accordance with Rule 2, FED. R. CRIM. PROC. Respectfully submitted, /s/  
 Carmen D. Hernandez Bar No. MD03366 7166 Mink Hollow Road Highland, MD 20777 (240) 472-3391  
 CERTIFICATE OF SERVICE I HEREBY CERTIFY that a copy of the foregoing was served via ECF on all  
 counsel of record this 8th day of February, 2022. /s/ Carmen D. Hernandez Carmen D. Hernandez 2

**Carmen D. Hernandez**  
 Bar No. MD03366  
 7166 Mink Hollow Road  
 Highland, MD 20777  
 (240) 472-3391

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of the foregoing was served via ECF on all counsel of record this 8<sup>th</sup> day of February, 2022.

/s/ Carmen D. Hernandez  
**Carmen D. Hernandez**