

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

UNITED STATES OF AMERICA

v.

Case No. 21-CR-175-2 (TJK)

JOSEPH RANDALL BIGGS, et al.,

Defendants.

**DEFENDANT BIGGS' MOTION TO BE PROVIDED A LAPTOP COMPUTER TO
REVIEW DISCOVERY MATERIALS AT THE ALEXANDRIA DETENTION CENTER**

On March 10, 2022 the United States Marshals Service (USMS) transported defendant Biggs from a Seminole County, Florida jail to the Alexandria Detention Center, Alexandria, Virginia (ADC). As the Court is aware, the volume of pretrial discovery materials in this January 6 action is unusually large. A major reason for transporting Biggs to the Washington, D.C. area was to enable him to review discovery in a facility with the technological capability for him to do that. At the ADC, Biggs has some increased ability to review discovery with his counsel present but still lacks a laptop computer or other device on which to store discovery and review it when his counsel is not present. Accordingly, defendant Biggs asks the Court for an Order directing the USMS to provide him with a laptop computer to be supplied by his counsel and which meets the security protocols of the ADC. A proposed order is attached.

Respectfully submitted,

COUNSEL FOR JOSEPH R. BIGGS

Dated: May 19, 2022

By: /s/ J. Daniel Hull
JOHN DANIEL HULL
DC Bar No. 323006
California Bar No. 222862
HULL MCGUIRE PC
1420 N Street, N.W.
Washington, D.C. 20005
(619) 895-8336 cell
(202) 429-6520 office
jd Hull@hullmcguire.com

CERTIFICATE OF SERVICE

The undersigned certifies that on May 19, 2022, Defendant Biggs' Motion to be Provided a Laptop Computer to Review Discovery Materials at the Alexandria Detention Center was served upon all counsel of record via the Electronic Case Filing (ECF) system.

By: */s/ J. Daniel Hull*
JOHN DANIEL HULL
DC Bar No. 323006
California Bar No. 222862
HULL MCGUIRE PC
1420 N Street, N.W.
Washington, D.C. 20005
(202) 429-6520
jdhull@hullmcguire.com