

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

|                           |   |                    |
|---------------------------|---|--------------------|
| UNITED STATES OF AMERICA, | ) |                    |
|                           | ) | No. 21-cr-214      |
| Plaintiff,                | ) |                    |
| v.                        | ) |                    |
|                           | ) | Hon. John D. Bates |
| JOSEPH LINO PADILLA,      | ) |                    |
|                           | ) |                    |
| Respondent.               | ) |                    |

**DEFENDANT'S RESPONSE TO PRESS COALITION'S  
APPLICATION FOR ACCESS TO VIDEO EXHIBITS**

On September 16, 2021, the Press Coalition filed with this Court an Application for Access to Video Exhibits pursuant to Standing Order 21-28. Dkt. No. 37. Specifically, the Press Coalition seeks permission to obtain copies of video exhibits that the government submitted to this Court during a hearing in this matter on May 3, 2021. The defense has no objection to the specific relief requested in the Press Coalition's motion.

Respectfully submitted,

JOSEPH LINO PADILLA  
By Counsel,

Jeremy C. Kamens,  
Federal Public Defender

By: Cadence Mertz  
Cadence A. Mertz  
D.C. Bar No. 991471  
Nathaniel Wenstrup  
Assistant Federal Public Defenders  
Office of the Federal Public Defender  
1650 King Street, Suite 500  
Alexandria, Virginia 22314

(703) 600-0840 (T)  
(703) 600-0880 (F)  
[Cadence\\_Mertz@fd.org](mailto:Cadence_Mertz@fd.org)

**CERTIFICATE OF SERVICE**

I hereby certify that on September 17, 2021, I will electronically file a copy of the foregoing using the CM/ECF system, which will electronically serve copies on counsel of record.

By: Cadence Mertz  
Cadence A. Mertz  
D.C. Bar No. 991471  
Assistant Federal Public Defender  
Office of the Federal Public Defender  
1650 King Street, Suite 500  
Alexandria, Virginia 22314  
(703) 600-0840 (T)  
(703) 600-0880 (F)  
[Cadence\\_Mertz@fd.org](mailto:Cadence_Mertz@fd.org)