

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

UNITED STATES OF AMERICA,

v.

CONNIE MEGGS,

Defendant.

Criminal No. 1:21-cr-00028-APM

MOTION TO HOLD IN ABEYANCE

Defendant Connie Meggs, by an through the undersigned counsel, hereby respectfully asks this Court to hold in abeyance Defendant Kelly Meggs's Motion to Exclude Confidential Marital Communications (Sep. 17, 2021) (ECF No. 431). The undersigned has consulted with the government as well as counsel for Mr. Meggs and neither oppose this request.

On September 17, 2021, Defendant Kelly Meggs filed a motion to exclude certain text message communications between Mr. Meggs and his wife, Connie Meggs. The government has advised that these communications included a third-party, the Meggs's adult son, Zach Meggs. Defense counsel wish to retain an expert to conduct a forensic analysis of the Meggs's phones to ascertain whether a third-party was in fact privy to the communications in question. The undersigned has consulted with one such expert, but anticipates speaking with others before making a selection.

No party should be prejudiced by this request as the Court has yet to issue a pretrial scheduling order nor set a deadline for the filing of motions *in limine*.

[SIGNATURE ON NEXT PAGE]

Dated: September 30, 2021

Respectfully submitted,

/s/ Stanley E. Woodward, Jr.

Stanley E. Woodward, Jr. (D.C. Bar No. 997320)

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CERTIFICATE OF SERVICE

On September 30, 2021, the undersigned hereby certifies that a true and correct copy of the foregoing was electronically filed and served via the CM/ECF system, which will automatically send electronic notification to all parties of record.

/s/ Stanley E. Woodward, Jr.

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