

**United States District Court
District of Columbia**

United States of America,

Plaintiff,

v.

Daniel Rodriguez,

Defendant.

Case No. 1:21-cr-00246-ABJ-1

Notice in Response to Minute Order Entered on November 5, 2021

I. Response

Counsel for Mr. Rodriguez attaches Exhibit A, “Declaration of Michele Blackwill,” to this Notice. Ms. Blackwill’s declaration details her interview with Daniel Rodriguez’s mother, Yolanda Gail. In compliance with this Court’s November 5, 2021 order, Exhibit A provides information underlying the arrest on March 31, 2021, which was discovered during the defense’s investigation. Thus far, counsel has only received one FBI 302 report detailing the execution of the arrest warrant of Mr. Rodriguez’s residence. Aside from Ms. Gail’s personal impressions, the information contained in the attached declaration does not contradict with information contained in the FBI 302.

If Ms. Gail is needed as a witness at the evidentiary hearing scheduled for November 16, 2021, it is respectfully requested that she may be permitted to testify via video. Ms. Gail is a resident of California.

Dated: November 10, 2021

Respectfully submitted,

RENE L. VALLADARES
Federal Public Defender

/s/Rebecca A. Levy
/s/Margaret W. Lambrose
/s/Katherine Tanaka
By: */s/Aarin E. Kevorkian*

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Attorneys for Daniel Rodriguez

Certificate of Electronic Service

The undersigned hereby certifies that she is an employee of the Federal Public Defender for the District of Nevada and is a person of such age and discretion as to be competent to serve papers.

That on November 10, 2021, she served an electronic copy of the above and foregoing **Notice in Response to Minute Order Entered on November 5, 2021** by electronic service (ECF) to the person named below:

CHANNING D. PHILLIPS
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/s/ Cecilia Valencia

Employee of the Federal Public
Defender