

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

UNITED STATES OF AMERICA

v.

**ZACHARY REHL,
Defendant**

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

**MOTION FOR LEAVE TO FILE ADDITIONAL MOTIONS
IN LIGHT OF GOVERNMENT'S
CONTINUING PRODUCTION OF DISCOVERY**

Zachary Rehl, by his undersigned counsel, hereby respectfully moves this Honorable Court to grant him leave to file additional motions as discovery is produced or as the need for the filing of additional motions becomes apparent once all discovery is reviewed.

1. As of the date of the Motions Deadline and despite the imposition of a Discovery Deadline that is long past, the Government has continued to produce extensive materials and has continued to produce discovery up to and including this week.

2. Undersigned counsel has not completed reviewing the materials produced after the discovery deadline and will need additional time to review the discovery recently produced and any that has yet to be produced.

3. Once discovery review is completed, it may be necessary to file additional motions.

WHEREFORE, Mr. Rehl respectfully moves this Honorable Court grant him leave to file additional motions, if after completion of the review of the discovery materials it becomes apparent that additional motions should be filed.

Respectfully submitted,

/s/

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was served via ECF on all counsel of record this 14th day of October, 2022.

/s/ Carmen D. Hernandez

Carmen D. Hernandez