

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

**UNITED STATES OF AMERICA,**

**v.**

**Case No. 1:21-cr-175-TJK**

**JOSEPH BIGGS, et al.,**

**Defendants.**

**BIGGS'S MOTION TO JOIN CERTAIN DEFENSE  
FILINGS TO BE ARGUED AT PRETRIAL CONFERENCE**

Defendant Joseph Biggs respectfully moves to join the following two defense motions and one defense opposition which will be argued before the Court at the pretrial conference of this matter on November 18, 2022:

1. Rehl Motion in Limine based on first amendment protections (ECF 495).
2. Nordean Motion to Exclude proposed government expert testimony (ECF 490).
3. Nordean Opposition to Government Motion in Limine (Omnibus) (ECF 505).

Biggs faces identical or similar evidentiary issues to those presented in the above filings and/or has lodged similar filings on the same issues for argument. Therefore, and for good cause shown, Biggs asks that he be permitted to join these two defense motions and one opposition related to the November 18, 2022 pretrial conference.

Respectfully submitted,

Dated: November 18, 2022

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

**CERTIFICATE OF SERVICE**

The undersigned certifies that on November 18, 2022, the foregoing Biggs's Motion to Join 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](mailto:jdhull@hullmcguire.com)