

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

UNITED STATES OF AMERICA :
 :
 :
 v. : **Criminal No.: 21-CR-79-BAH**
 :
 :
 KEVIN JAMES LYONS, :
 :
 Defendant. :

MOTION TO COMPEL

Now comes the Defendant, Kevin Lyons, by his attorney, Lawrence Wolf Levin, in accordance with the Court’s previous order entered on September 12, 2022. In support thereof, Defendant states as follows:

1. That defendant, Kevin Lyons, had previously made requests for discoverable items and information, to which he is entitled, to properly make the appropriate decision whether to go to trial and/or enter a plea in the aforesaid matter.
2. Despite the statements contained in the Government’s opposition to Defendant’s Motion to Compel, when Counsel was contacted by the Government to supply certain hard-drives for the transfer of the information, Counsel did so on a timely basis.
3. To date, Counsel has supplied the Government with an eight terabyte hard-drive on or about September 6, 2022, and shortly thereafter on September 15, 2022, supplied a four terabyte hard-drive to the F.B.I. so the additional requested information can be tendered.
4. That further, Counsel has not received a reply from the Government, or the Government’s Attorney relative to the opportunity to inspect Speaker Pelosi’s chambers and office relative to the aforesaid charges in question.

5. To date, despite the tendering of the differing hard-drives totaling twelve terabytes, Counsel has not received the aforesaid information as previously been requested.
6. Defendant maintains his request for this information, and as stated herein, that despite compliance with the Government's requests, has not received the information or a response to his request to inspect.

WHEREFORE, Defendant, Kevin Lyons, by his attorney, Lawrence Wolf Levin, moves this Court for the entry of an order on the United States of America to comply with Defendant's request and facilitate the requested discovery and the opportunity for the inspection of Speaker Pelosi's chambers.

Respectfully submitted,

/s/Lawrence Wolf Levin
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