

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

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<b>UNITED STATES OF AMERICA</b>		)
		)
<b>v.</b>		)
		)
<b>CHRISTOPHER WARNAGIRIS</b>		)
		)
<b>DEFENDANTS.</b>		)
<hr/>		)

CRIMINAL CASE NO: 1:21-CR-00382-PLF

**DEFENDANT’S REPLY TO GOVERNMENT’S FILING ECF No. 57**

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Having endeavored for a prolonged period to acquire Grand Jury materials from the Government, the Defense, on May 18, 2023, found it necessary to submit a motion requesting these materials. This step was prompted by the latest communication from Government counsel Rebekah Lederer, dated April 27, 2023, asserting that "the transcripts are not ripe for production at this time."

A few hours after the Defense filed the Motion seeking Grand Jury materials (ECF No. 56) Ms. Lederer emailed one of the Grand Jury transcripts to the defense, along with identifying the exhibits used. Government counsel also advised that the exhibits were previously produced to defense counsel— albeit they were not labeled as Grand Jury exhibits. A correction to the production and an additional Grand Jury transcript were emailed to defense counsel the next day.

Immediately following the distribution of these materials to the defense, the Government, on May 19, 2023, submitted its formal Response to the Defendant’s Motion (ECF No. 57). Ms. Lederer informed the court that all necessary materials had been furnished and thus the

Defendant's motion is moot, yet opposing counsel obfuscated the chronology of the production and created an implication that defendant's motion was potentially frivolous, requiring the defense to file this Reply for clarification.

ECF No. 56 has been rendered moot through the Government's production of the Grand Jury materials in response to the filing.

Respectfully submitted,

By Counsel:

\_\_\_\_\_/s/\_\_\_\_\_  
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**CERTIFICATE OF SERVICE FOR CM/ECF**

I hereby certify that on May 22, 2023, I will electronically file the foregoing with the Clerk of the Court for the United States District Court for the District of Columbia by using the CM/ECF system. I certify that all participants in the case are registered CM/ECF users, and that service will be accomplished by the CM/ECF system.

\_\_\_\_\_/s/\_\_\_\_\_  
Marina Medvin, Esq.