

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

UNITED STATES OF AMERICA	:	CRIMINAL NO. 21-cr-28 (APM)
	:	
v.	:	
	:	
DONOVAN CROWL,	:	
SANDRA PARKER,	:	
BENNIE PARKER,	:	
LAURA STEELE,	:	
CONNIE MEGGS,	:	
WILLIAM ISAACS,	:	
JAMES BEEKS, and	:	
MICHAEL GREENE,	:	
	:	
Defendants.	:	

**GOVERNMENT’S MOTION FOR LEAVE TO LATE FILE
NOTICE PURSUANT TO FEDERAL RULE OF EVIDENCE 404(b)**

The government respectfully requests leave to late file the enclosed notice, pursuant to Rule 404(b) of the Federal Rules of Evidence, of its intent to introduce certain evidence at trial. Under this Court’s Pretrial Scheduling Order, ECF No. 703, the government’s notice was due November 23. The enclosed filing provides notice of evidence that was already noticed in the related matter of *United States v. Rhodes, et al.*, 22-cr-15-APM, and about which the government provided discovery many months ago. Accordingly, there is no prejudice in filing this notice 45 days prior to trial. The government has consulted with counsel for the defendants and counsel for Defendants Donovan Crowl, Sandra Parker, Bennie Parker, Connie Meggs, and Michael Greene object. Undersigned counsel had not heard back from counsel for Defendants William Isaacs, Laura Steele, and James Beeks as of the time of filing.

For the foregoing reasons, the government respectfully requests that the Court grant leave for the government to late file the enclosed notice.

Respectfully submitted,

MATTHEW M. GRAVES
UNITED STATES ATTORNEY
D.C. Bar Number 481052

By: _____ /s/

Kathryn L. Rakoczy
Assistant United States Attorney
D.C. Bar No. 994559
Ahmed M. Baset
Troy A. Edwards, Jr.
Louis Manzo
Jeffrey Nestler
Assistant United States Attorneys
U.S. Attorney's Office for the District of Columbia
601 D Street NW
Washington, D.C. 20530

_____ /s/

Alexandra Hughes
Justin Sher
Trial Attorneys
National Security Division,
United States Department of Justice
950 Pennsylvania Avenue NW
Washington, D.C. 20004