

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

UNITED STATES OF AMERICA	:	
	:	
v.	:	Criminal No. 21-CR-0378 (TJK)
	:	
PAUL RAE	:	
KEVIN A. TUCK	:	
NATHANIEL A. TUCK	:	

STATUS REPORT

Pursuant to the Court’s Minute Order of January 21, 2022, undersigned counsel proposes that by March 31, 2022, she believes she should be able to complete a conflicts evaluation and prepare a written report and recommendation to the Court regarding whether John Pierce’s representation of Paul Rae, Kevin Tuck, and Nathaniel A. Tuck in this matter creates a conflict between any of them and Mr. Pierce, and if so, whether the codefendants can waive any conflict that may exist.

By way of explanation for the March 31, 2022, proposed date, undersigned counsel states that her preliminary review of the relevant Rules of Professional Conduct, *i.e.*, Rule 1.7 (Conflict of Interest: General Rule), and Rule 1.8 (Conflict of Interest: Specific Rules) will necessitate her speaking directing with each Paul Rae, Kevin Tuck, and Nathaniel A. Tuck, as well as with John Pierce with respect to his compensation for representing he three co-defendants in the above-captioned matter. *See*, Rule of Professional Conduct 1.8 (e) (regarding compensation from someone other than the client being represented). As such, undersigned counsel anticipates needing contact information for each Paul Rae, Kevin Tuck, and Nathaniel A. Tuck. Moreover, because each of the three co-defendants is a represented party and undersigned counsel will need to speak with them regarding the matter in which they are represented, undersigned counsel respectfully requests an

Order from the Court authorizing such direct communication with represented parties regarding the matters in which they are represented so as not to violate Rule of Professional Conduct 4.2¹ and further respectfully requests an Order authorizing the Pretrial Services Agency to disclose contact information for each of the three co-defendants to undersigned counsel.

Dated: January 28, 2022

Respectfully submitted,

s/Santha Sonenberg

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¹**Rule 4.2: Communication Between Lawyer and Person Represented by Counsel:** (a) During the course of representing a client, a lawyer shall not communicate or cause another to communicate about the subject of the representation with a person known to be represented by another lawyer in the matter, unless the lawyer has the prior consent of the lawyer representing such other person or is authorized by law or **a court order to do so**. (emphasis supplied).