

United States District Court
District of Columbia

United States of America,

Plaintiff,

v.

Daniel Rodriguez,

Defendant.

Case No. 1:21-cr-00246-ABJ-1

Notice in Response to Minute Order from January 14, 2022

I. Response

Counsel has no plans to file any motions to Fed. R. Crim. Proc. 12(b)(3)(B)(i)-(iii) and (v) alleging any defect or defects in the indictment, any further motions to suppress evidence pursuant to Rule 12(b)(3)(C), any motions alleging improper joinder under Rule 12(b)(3)(B)(iv) or motions seeking severance of charges or defendants under Rules 12(b)(3)(D) and 14.¹

¹ There is a third co-defendant who has yet to be identified to Mr. Rodriguez. The apprehension of this co-defendant and any post-arrest statements or additional discovery may require Mr. Rodriguez to file the appropriate motions.

Dated: January 21, 2022

Respectfully submitted,

RENE L. VALLADARES
Federal Public Defender

/s/Rebecca A. Levy
/s/Margaret W. Lambrose
By: */s/Katherine Tanaka*

REBECCA A. LEVY
MARGARET W. LAMBROSE
KATHERINE TANAKA
Assistant Federal Public Defenders

Attorneys for Daniel Rodriguez

Certificate of Electronic Service

The undersigned hereby certifies that she is an employee of the Federal Public Defender for the District of Nevada and is a person of such age and discretion as to be competent to serve papers.

That on January 21, 2022, she served an electronic copy of the above and foregoing **Notice in Response to Minute Order** by electronic service (ECF) to the person named below:

CHANNING D. PHILLIPS
United States Attorney
Kimberly L. Paschall
Tara Ravindra
Assistant United States Attorneys
555 4th Street, NW
Washington, DC 20530

/s/ Cecilia Valencia

Employee of the Federal Public
Defender