

UNITED STATES DISTRICT COURT
DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA)	
Plaintiff)	Criminal Case 21-CR-28
)	
v.)	Motions Hearing: September 8, 2021
)	
WILLIAM ISAACS)	Judge Amit P. Mehta
Defendant)	

NOTICE OF RESERVING RIGHT TO FILE SUBSTANTIVE MOTIONS

PLEASE TAKE NOTICE that Defendant William Isaacs ("Mr. Isaacs"), through undersigned counsel, hereby provides notice that he reserves his right to file a motion for severance, as well as any other motion on substantive issues, as discovery progresses in this historic matter and before any trial on the merits.

Mr. Isaacs is required to raise pretrial a motion for severance of charges from the other defendants in this case under Fed. R. Crim. P. 14(a), if and when the basis for the motion is reasonably available and the motion can be determined without a trial on the merits. *See* Fed. R. Crim. P. 12(b)(3)(D). This Honorable Court has stated that it will "certainly consider" motions filed after the September 2, 2021, deadline, but preferably not on the eve of trial, as the discovery in this case proceeds and more information is available to substantiate such motions. *See* August 10, 2021, Hearing Transcript, pp. 57-58.

Therefore, Mr. Isaacs respectfully reserves his right to file a motion for severance or any other substantive motion once the basis for a motion is reasonably available and a motion can be determined without a trial on the merits. Given the unprecedented

amount of discovery that has and shall be provided in the largest criminal investigation in the history of the Justice Department, a reservation of our right to file substantive motions has more than a substantial basis.

Last, Mr. Isaacs filed a notice (Doc. 303) to join in and adopt certain Defendants' motions, including one to transfer venue. However, Mr. Isaacs refuses to join in gratuitous rhetorical surplusage and vituperative political commentary, such as that set forth in Defendant Thomas Caldwell's motion (Doc. 273, pp. 13-18).

Respectfully submitted,



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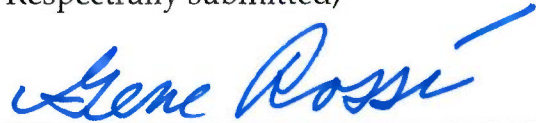
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Counsel for Defendant William Isaacs

CERTIFICATE OF SERVICE

I hereby certify that the NOTICE OF RESERVING RIGHT TO FILE
SUBSTANTIVE MOTIONS was filed with the Clerk of the Court via ECF and emailed
to counsel of record for the United States on Wednesday, September 1, 2021.

Respectfully submitted,

A handwritten signature in blue ink that reads "Gene Rossi". The signature is written in a cursive, flowing style. The first name "Gene" is written in a larger, more prominent script, and "Rossi" follows in a similar but slightly smaller script. The signature is positioned above a horizontal line.

Gene Rossi, Esquire