

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

Complainant,

v.

KELLY MEGGS

*(Styled as USA v. Thomas Edward Caldwell
incorporating cases against multiple Defendants)*

Defendant

Criminal Case No.

1:21-cr-28-8-APM

Assigned to the Honorable
Amit Mehta, District
Court Judge

MOTION FOR LEAVE OF COURT TO FILE
AMENDED
DEFENDANT’S KELLY MEGG’S REPLY MEMORANDUM OF POINTS AND
AUTHORITIES IN FURTHER SUPPORT OF
ISSUANCE OF A SUBPOENA DUCES TECUM TO THE U.S. CAPITOL POLICE

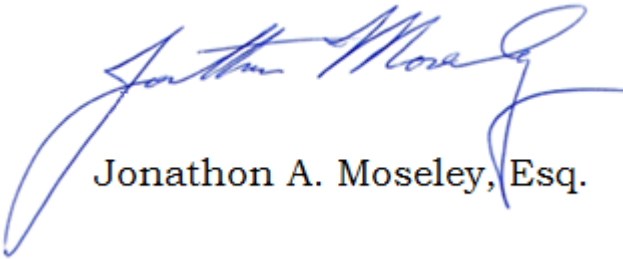
Comes now Defendant, Kelly Meggs, by counsel, and requests leave of court to file an *Amended* Reply Memorandum of Points And Authorities in Further Support of his Motion for Issuance of a Subpoena Duces Tecum to the U.S. Capitol Police (ECF Nos. 500, 501) and for his grounds states as follows.

Upon review, counsel for Kelly Meggs realizes that his Reply was so narrowly focused on responding to the Opposition of the Government that the meaning of the Reply was obscured and not clear without an introductory explanation of the context of the Reply.

In the Amended version, Counsel has added a new Section II “Recap and Review” because the original version responded very specifically to the Government’s Opposition but ended up being difficult to follow without first reviewing the main idea of the motion.

Dated: December 14, 2021

RESPECTFULLY SUBMITTED
KELLY MEGGS, *By Counsel*



Jonathon A. Moseley, Esq.

USDCDC Bar No. VA005
Virginia State Bar No. 41058
Mailing address only:
5765-F Burke Centre Parkway, PMB #337
Burke, Virginia 22015
Telephone: (703) 656-1230
Contact@JonMoseley.com
Moseley391@gmail.com

CERTIFICATE OF SERVICE

I hereby certify that on December 14, 2021, I electronically filed the foregoing document with the Clerk of the Court by using the CM/ECF system, which will send a notice of electronic filing to the following CM/ECF participants. From my review of the PACER / ECF docket records for this case that the following attorneys will receive notice through the ECF system of the U.S. District Court for the District of Columbia.

Jeffrey S. Nestler
U.S. ATTORNEY'S OFFICE
555 Fourth Street NW
Washington, DC 20530
202-252-7277
jeffrey.nestler@usdoj.gov

Kathryn Leigh Rakoczy
U.S. ATTORNEY'S OFFICE FOR THE DISTRICT OF COLUMBIA
555 Fourth Street, NW
Washington, DC 20530
(202) 252-6928
(202) 305-8537 (fax)
kathryn.rakoczy@usdoj.gov

Justin Todd Sher
U.S. DEPARTMENT OF JUSTICE
950 Pennsylvania Avenue NW
Washington, DC 20530
202-353-3909

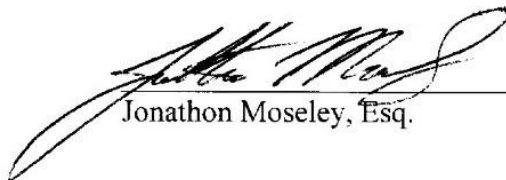
justin.sher@usdoj.gov

Troy A. Edwards, Jr
U.S. ATTORNEY'S OFFICE FOR THE DISTRICT OF COLUMBIA
555 4th Street, NW
Washington, DC 20001
202-252-7081
troy.edwards@usdoj.gov

Alexandra Stalimene Hughes
DOJ-Nsd
950 Pennsylvania Ave NW
Washington DC, DC 20004
202-353-0023
Alexandra.Hughes@usdoj.gov

Louis J. Manzo
DOJ-CRM
1400 New York Ave NW
Washington, DC 20002
202-616-2706
louis.manzo@usdoj.gov

Ahmed Muktadir Baset
U.S. ATTORNEY'S OFFICE
United States Attorney's Office for the District of Col
555 Fourth Street, N.W., Room 4209
Washington, DC 20530
202-252-7097
ahmed.baset@usdoj.gov



Jonathon Moseley, Esq.