

UNITED STATES DISTRICT COURT
DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA)	
Plaintiff)	Criminal Case 21-CR-28-APM
)	
v.)	Trial: February 1 or April 2023
)	
WILLIAM ISAACS)	Judge Amit P. Mehta
Defendant)	

FOURTH NOTICE OF JOINING MOTIONS OF CO-DEFENDANTS

PLEASE TAKE NOTICE that Defendant William Isaacs ("Mr. Isaacs"), through undersigned counsel, hereby joins and adopts the following motions filed by his co-defendants in the above-referenced matter and defendants in related matters:

1. Defendant Roberto Minuta's Request for Application of Rule 106 Pursuant to the Text of the Rule, ECF Doc. 427 in Criminal Case 22-cr-15-APM;
2. Defendant Michael Greene's Omnibus Pretrial Motion, ECF Doc. 784 in Criminal Case 21-CR-28-APM;
3. Defendant Michael Greene's Renewed Motion or Change of Venue and/or for Expanded Venire and Additional Peremptory Challenges, ECF Doc. 786 in Criminal Case 21-CR-28-APM;
4. Defendant Michael Greene's Motion to Require the Government to Reveal Any Agreement Entered into Between the Government and Any Witness, ECF Doc. 787 in Criminal Case 21-CR-28-APM;
5. Defendant Michael Greene's Motion to Unseal Documents, ECF Doc. 788 in Criminal Case 21-CR-28-APM;

6. Defendant Donovan Crawl's Motion in Limine to Exclude/Limit/or Modify Government's Video Exhibits, ECF Doc. 790 in Criminal Case 21-CR-28-APM;
7. Defendant Donovan Crawl's Motion in Limine to Preclude Government's Use Against Him of Statements Protected by the First Amendment, ECF Doc. 791 in Criminal Case 21-CR-28-APM, as that legal argument would apply to any such statements by Mr. Isaacs; and
8. Defendant Donovan Crawl's Motion to Require Government to Designate and Produce Any Images, Video and Audio Recordings, et al., ECF Doc. 792 in Criminal Case 21-CR-28-APM, as that legal argument would apply to any such statements by Mr. Isaacs.

Mr. Isaacs joins in and incorporates by reference the arguments raised and the case law cited in the above motions. To the extent the motions are fact specific to those defendants, the legal analysis will apply equally to all defendants, if granted.

Additionally, in filing this Fourth Notice, Mr. Isaacs seeks to benefit from this Court's rulings on the motions, which will promote the just determination of the case, simplify procedures, and eliminate unjustifiable expense and delay in accordance with

Fed. R. Crim. P. 2.

Respectfully submitted,

Thursday 12/29/2022


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Counsel for Defendant William Isaacs

CERTIFICATE OF SERVICE

I hereby certify that the FOURTH NOTICE OF JOINING MOTIONS OF CO-
DEFENDANTS was filed with the Clerk of the Court via ECF on Thursday, December
29, 2022.

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 with a large, looped 'G', and the last name "Rossi" is written with a large, looped 'R'. The signature is positioned above a horizontal line.

Gene Rossi, Esquire