## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,	) ) ) Criminal No. 1:21-cr-00040-TNM
v.	
FREDERICO GUILLERMO KLEIN,	)
Defendant.	)

## **MOTION TO JOIN AND ADOPT**

Federico Guillermo Klein, by and through undersigned counsel, and pursuant to Rule 2 of the Federal Rules of Criminal Procedure, hereby respectfully requests this Court permit him to adopt and join the following Motions (as well as any replies in support thereof):

- Steven Cappuccio's Motion to Dismiss (April 14, 2022) (ECF No. 253);
- David Lee Judd's Motion to Dismiss (April 15, 2022) (ECF No. 254);
- David Lee Judd's Motion to Dismiss (April 15, 2022) (ECF No. 255);
- David Lee Judd's Motion to Dismiss (April 15, 2022) (ECF No. 256) (although Mr. Judd's Motion seeks to dismiss counts thirty-eight (38) and forty-six (45) of the December 1, 2021, Fifth Superseding Indictment (ECF No. 179), Mr. Klein is charged with the same alleged conduct, under the same provisions of the criminal code, at counts forty-three (43) and fifty-one (51) and therefore requests leave to adopt Mr. Judd's Motion as to those counts);
- David Lee Judd's Motion to Transfer Venue (April 15, 2022) (ECF No. 257); and
- Patrick McCaughey III's Motion to Dismiss (April 16, 2022) (ECF No. 259).

The government has charged Mr. Klein with the same or substantially similar counts as those addressed in the foregoing motions and the alleged "concerted conduct," applicable law, and arguments applied thereto apply equally to Mr. Klein as to his co-defendants.

[SIGNATURE ON NEXT PAGE]

Dated: June 3, 2022 Respectfully submitted,

/s/ Stanley E. Woodward, Jr.

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## **CERTIFICATE OF SERVICE**

On June 2, 2022, the undersigned hereby certifies that a true and correct copy of the foregoing was electronically filed and served via the CM/ECF system, which will automatically send electronic notification of such filing to the following registered parties:

/s/ Stanley E. Woodward, Jr.

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