

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

**UNITED STATES OF AMERICA**

**v.**

**ETHAN NORDEAN**

**JOSEPH BIGGS**

**ZACHARY REHL**

**CHARLES DONOHOE**

**ENRIQUE TARRIO**

**DOMINIC PEZZOLA**

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**Criminal No. 21-CR-0175 (TJK)**

**STATUS REPORT**

Pursuant to the Court's Minute Order of March 25, 2022, undersigned counsel proposes that by June 30, 2022, she believes she should be able to complete a conflicts evaluation and prepare a written report and recommendation to the Court regarding whether John Daniel Hull's representation of Joseph R. Biggs in the above-captioned case and of Enrique Tarrio in other matters creates any conflict of interest and, if so, whether Messrs. Biggs and Tarrio can waive any conflict(s) that may exist.

By way of explanation for the June 30, 2022, proposed date, undersigned counsel states that her preliminary review of the relevant Rules of Professional Conduct, will necessitate her speaking directing with each Joseph Biggs and Enrique Tarrio as well as with each of their counsel, *i.e.*, John Daniel Hull, and Nayib Hassan and Sabino Jauregui. As such, undersigned counsel anticipates needing contact information for each Joseph Biggs and Enrique Tarrio. Moreover, because Messrs. Biggs and Tarrio are represented parties and undersigned counsel will need to speak with them regarding the matter(s) in which they are represented, undersigned counsel respectfully requests an

Order from the Court authorizing such direct communication with represented parties regarding the matters in which they are represented so as not to violate Rule of Professional Conduct 4.2<sup>1</sup> and further respectfully requests an Order authorizing the Pretrial Services Agency to disclose contact information for Messrs. Biggs and Tarrío to undersigned counsel.

In addition, undersigned counsel believes that her other obligations and commitments, and the unusual issues posed by the situation in this case, preclude her being able to complete a Report and Recommendation before the end of June 2022.

**Dated: April 6, 2022**

Respectfully submitted,

*s/Santha Sonenberg*

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<sup>1</sup>**Rule 4.2: Communication Between Lawyer and Person Represented by Counsel:** (a) During the course of representing a client, a lawyer shall not communicate or cause another to communicate about the subject of the representation with a person known to be represented by another lawyer in the matter, unless the lawyer has the prior consent of the lawyer representing such other person or is authorized by law or **a court order to do so**. (emphasis supplied).