

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

**UNITED STATES OF AMERICA**

**v.**

**ZACHARY REHL,  
Defendant**

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**CASE NO: 1:21-cr-0175-3 (TJK)**

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**DEFENDANT’S MOTION TO COMPEL GOVERNMENT TO  
PROVIDE NOTICE OF INTENT TO USE SPECIFIED EVIDENCE  
IN ITS CASE-IN-CHIEF AT TRIAL**

Pursuant to Federal Rules of Criminal Procedure 16(a)(1)(E) and 12(b)(4)(B), defendant Zachary Rehl moves for an Order compelling the government to provide notice of its intent to use specified evidence in its case-in-chief at trial. As in other cases that involve voluminous discovery, this is a practice that has been ordered by courts in select cases. *See, e.g., United States v. Anderson*, 416 F. Supp. 2d 110, 112, 116 (D. D.C. 2006) (requiring government to identify which grand jury materials it intended to use in its case-in-chief); *United States v. Poindexter*, 727 F. Supp. 1470, 1484 (D. D.C. 1989) (ordering government to identify, among other things, all documents on which a witness will rely or to which he will refer at trial).

A supporting Memorandum and proposed Order are attached.

Respectfully submitted,

/s/

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of the foregoing was served via ECF on all counsel of record this 21<sup>st</sup> day of April, 2022.

*/s/ Carmen D. Hernandez* \_\_\_\_\_

**Carmen D. Hernandez**