

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA :  
 :  
 v. : CRIMINAL NO. 21-cr-00216 (JDB)  
 :  
 LEO BRENT BOZELL IV, :  
 :  
 Defendant. :

**UNITED STATES' MOTION FOR LEAVE TO FILE SUPPLEMENTAL AUTHORITY**

The United States of America respectfully submits this motion for leave to file supplemental authority.

On January 21, 2022, defendant Leo Brent Bozell IV filed a reply brief (Dkt No. 36) in support of his motion to dismiss (Dkt No. 33). The reply brief drew the Court's attention to a motion for reconsideration that was, at the time, pending before Judge Mehta in *United States v. Caldwell*, 21-cr-00028.

On January 24, 2022, Judge Mehta denied the motion for reconsideration and issued a memorandum opinion attached hereto as Exhibit A. It is interests of justice for the Court to grant this motion for leave to file supplemental authority (Exhibit A), and to consider Judge Mehta's memorandum opinion in connection with the defendant's pending motion to dismiss.

Respectfully submitted,

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By: \_\_\_\_\_/s/\_\_\_\_\_

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 **Defendant.** :

**PROPOSED ORDER**

Having considered the United States of America’s motion for leave to file supplemental authority (Judge Mehta’s January 22, 2022, memorandum opinion in *United States v. Caldwell*, 1:21-cr-00028), and finding that granting the motion would be in the interests of justice, it is hereby ORDERED that the motion be, and hereby is, GRANTED.

IT IS SO ORDERED.

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The Hon. John D. Bates  
United States District Judge