

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

<b>UNITED STATES OF AMERICA</b>	:	
	:	<b>CASE NO. 21-cr-246 (ABJ)</b>
<b>v.</b>	:	
	:	
<b>DANIEL RODRIGUEZ, et. al.</b>	:	
	:	
<b>Defendants.</b>	:	

**GOVERNMENT’S MOTION TO FILE MEMORANDUM IN OPPOSITION  
IN EXCESS OF 45 PAGE LIMIT**

The government now seeks leave of this Court to file its Memorandum in Opposition to the defendants’ several Motions to Dismiss in excess of the 45-page limit proscribed in Local Criminal Rule 47(e). The government sought leave of this Court to file an omnibus response to the several motions filed (ECF No. 109), including both defendants’ motions to dismiss Counts Two and Three of the Indictment alleging violations of 18 U.S.C. § 1512(c)(2) and 18 U.S.C. § 1512(c)(1) (ECF No. 106 and 108), and defendant Badalian’s motion to dismiss Count Ten alleging a violation of 18 U.S.C. § 1752 (ECF No. 106). The Court granted that request. Docket Text, Minute Order June 2, 2022. Addressing the concerns raised by each defendant has caused the government response to exceed 45 pages. For the foregoing reasons, the government requests permission to file a memorandum in opposition in excess of the 45 pages permitted by Local Criminal Rule 47(e).

Respectfully submitted,

MATTHEW M. GRAVES  
UNITED STATES ATTORNEY  
D.C. Bar No. 481052

