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Attorney for Defendant,
EDWARD BADALIAN

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

UNITED STATES OF AMERICA,

Plaintiff

**DANIEL JOSEPH “DJ” RODRIGUEZ,
(Counts 1, 2, 3, 4, 6, 7, 8, 10)**

**Case Number: 21-cr-246
[Oral Argument Requested]**

**EDWARD BADALIAN
(Counts 1, 2, 3, 10)**

Defendants.

**DEFENDANT, EDWARD BADALIAN’S MOTION FOR LEAVE TO LATE FILE
DEFENDANT EDWARD BADALIAN’S REPLY TO GOVERNMENT’S OMNIBUS
OPPOSITION TO MOTION TO DISMISS COUNTS II, III, AND X OF THE
INDICTMENT**

Defendant Edward Badalian, by and through his attorney, respectfully moves the Court for a leave to late-file a reply to Government’s Omnibus Opposition to Defendants’ Motions to Dismiss Counts II, III and X of the Indictment. Attached to this motion is DEFENDANT, EDWARD BADALIAN’S REPLY TO GOVERNMENT’S OPPOSITION (ECF NO. 113) TO

MOTION TO DISMISS COUNTS II, III, AND X OF THE REDACTED INDICTMENT (ECF NO. 108).

The Government sought and was given an extension of time to file its Omnibus Opposition to Defendants' Motions to Dismiss Counts II, III and X of the Indictment.

Defendant, Edward Badalian's counsel has conferred with the Government and the Government did not object to Defendant, Edward Badalian's late-filing of the Reply. Defendant, Edward Badalian's counsel hereby requests permission to file his Reply to Government's Opposition which is attached hereto.

I HEREBY CERTIFY that on the 5th day of July, 2022, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system which will send a notice of electronic filing to the following: Kimberly Paschall, Assistant U.S. Attorney.

Respectfully submitted

s/ Tigran Martinian

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