

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

UNITED STATES

:

v.

: Crim. No. 21-CR-291-1 (ABJ)

THOMAS F. SIBICK

:

**DEFENDANT THOMAS SIBICK'S NOTICE REGARDING PRETRIAL MOTIONS**

Defendant Thomas F. Sibick, through undersigned counsel, Stephen F. Brennwald, in response to this Court's January 4, 2022, Minute Order, states as follows:

Mr. Sibick intends to file a motion to dismiss the indictment, a motion regarding misjoinder/severance (unless the necessity for such a motion is obviated by guilty pleas by both co-defendants), and possibly one or more motions to suppress, depending on further review of ongoing discovery.

Defendant may also file a motion to transfer venue.

The defendant, in consultation with the government, proposes that any such motions be submitted no more than ninety (90) days following the upcoming status hearing, that the government be given two weeks to respond, followed by a one-week period for any reply.

Respectfully submitted,

/s/

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was sent by ECF, this 11<sup>th</sup> day of January, 2022 to the U.S. Attorney's Office, 555 4<sup>th</sup> Street, N.W., Washington, D.C. 20530, and to all counsel of record.

/s/

Stephen F. Brennwald