

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

UNITED STATES OF AMERICA	:	
	:	CASE NO. 21-cr-537-JMC
v.	:	
	:	
RYAN SAMSEL, et al.,	:	
	:	
Defendants.	:	

**UNITED STATES' MOTION TO FILE RESPONSE
IN OPPOSITION CONTAINING EXCESS PAGES**

The United States of America respectfully moves this Court for leave to file the attached Omnibus Response containing approximately 14 excess pages, for the reasons set forth below:

1. On October 28, 2022, various defendants in this case filed motions to dismiss counts in the Third Superseding Indictment, ECF 80. *See* ECF 202, 204, 205, 208, 210. Other defendants submitted filings seeking to join in those motions. ECF 207, 209, 211, 212, 213.

2. The United States has prepared an Omnibus Response opposing all of the motions to dismiss counts in a single filing. Relevant procedural history is similar for all defendants, and the legal standard governing all of the motions to dismiss counts is the same. Although not identical in every respect, the motions to dismiss counts largely raise the same or similar issues. Accordingly, an omnibus response to these motions avoids repetition and conserves resources.

3. Since the Omnibus Response addresses several motions in a single opposition, it exceeds the page limitation stated in this Court's local rules. *See* Local Rules for the United States Court for the District of Columbia, LCrR 47(e)(limiting responses to motions to 45 pages). Although the omnibus response exceeds the page limit numerically, with approximately 59 pages, the United States submits that it complies with the objectives of the rule, since the government's response addresses five separate motions in a single filing. In this context, no opposing party will

be prejudiced as a result of the additional pages in the omnibus response.

4. Counsel for defendants Randolph and Johnson have advised that they do not object to the relief requested herein. Counsel for the remaining defendants have not yet provided their position.

WHEREFORE, the United States respectfully moves this Court for leave to file the government's omnibus response consisting of approximately 59 pages.

Respectfully submitted,

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