

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

v.

KENNETH JOSEPH OWEN THOMAS,

Defendant

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Criminal Case No.

1:21-cr-00552 (CRC)

DECLARATION OF John M. Pierce, ESQ.

I, John M. Pierce, esq., hereby declare affirm and attest, under my oath and under penalties of perjury, that the following facts are true and within my personal knowledge.

1. At no time in my career of 22 years, including in this case, have I ever one time intentionally flouted a Court order or intentionally made an inaccurate statement to any Court or opposing counsel.
2. Myself and the staff in my firm have been working furiously during the past week attempting to comply with every single Court order.
3. Despite an overwhelming caseload on January 6th cases and a relentless trial schedule facing an opponent of unlimited resources, myself and my firm are doing our absolute best to comply with every Court order, which we will of course continue to do.
4. Because of this caseload, numerous tasks before trial are performed by my partner Roger Roots and our Client Advocate/Paralegal Emily Lambert. I supervise and observe them on a daily basis performing literally heroic work on behalf of the most downtrodden individuals in the country.
5. I will endeavor to personally work more closely with them in the days leading up to and during trial to help ensure all Court orders are rigorously adhered to.
6. While I do not have personal knowledge of every single detail of every single interaction with Samantha Miller and my staff due to the volume of these communications, to the best of my knowledge, every fact set forth in the Declarations of Mr. Roots and Ms. Lambert attached in support hereof are true and correct.

Date: May 11, 2023

Respectfully Submitted,

/s/ John M. Pierce

John M. Pierce

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Attorney for Defendant

