

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

UNITED STATES OF AMERICA

v.

JEREMY BROWN,

Defendant.

No. 21-Cr-609

Hon. Judge Amit P. Mehta

SUPPLEMENT TO JEREMY BROWN's RESPONSE

JEREMY BROWN, by and through undersigned counsel, respectfully supplements his response with the following information:

The undersigned was first notified of the government's intent to join Mr. Brown at trial with defendants Donovan Cowl, James Beeks, and Kellye Sorelle, when the Motion to Join was filed on March 1, 2023.¹ As a result, the undersigned has not attended previous status conferences or hearings involving the other defendants.

On March 24, 2023, the undersigned received an e-mail from AUSA Kathryn L. Rakoczy indicating that the Court had set the trial for the month of July 2023. The undersigned attorney, Dan Eckhart, is getting married the week of July 16, 2023. The wedding has been planned for almost a year and non-refundable deposits have been paid to book the event. Additionally, the undersigned, his fiancé, family members and guests have paid non-refundable reservations as the wedding will take place on a week-long cruise.

¹ The government filed without first consulting defense counsel. Additionally, the motion did not include a trial date.

If the Court grants the government's motion and the trial takes place in July 2023, the undersigned has a legitimate conflict which would further prejudice Mr. Brown if he is joined at trial with the other defendants.

Dated: March 27, 2023

Orlando, Florida

Respectfully submitted,

By: /s/ Dan Eckhart
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CERTIFICATE OF SERVICE

I hereby certify that on March 27, 2023, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which sent notification of such filing to all parties listed on the Electronic Case Filing (ECF) System.

By: /s/ Dan Eckhart
DAN ECKHART