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KIM MICHAEL SORGENTE

8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF COLUMBIA**
10 **(WASHINGTON, DC)**

11
12 UNITED STATES OF AMERICA,
13 Plaintiff,
14 v.
15 KIM MICHAEL SORGENTE.

Case No. 1:21-mj-00634-RMM-1

**KIM MICHAEL SORGENTE’S
REQUEST FOR NOTICE
PURSUANT TO FEDERAL RULES
OF EVIDENCE 404(b) AND 609**

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18 Pursuant to Rules 404(b) and 609 of the Federal Rules of Evidence, defendant
19 Kim Michael Sorgente, hereby requests written notice by plaintiff, United States of
20 America, of the nature of any evidence it intends to introduce at trial pursuant to Rules
21 404(b) and 609. Specifically, Mr. Sorgente requests notice under Rule 404(b), of other
22 crimes, wrongs, or acts it intends to introduce, along with the purpose for which such
23 evidence shall be offered. Mr. Sorgente also requests notice of any prior convictions
24 the government intends to introduce pursuant to Rule 609.

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1 It is the position of Mr. Sorgente that the notice should be provided no later than
2 November 15, 2021, so that pretrial motions may be prepared.

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5 Respectfully submitted,
6 CUAUHTEMOC ORTEGA
7 Federal Public Defender

8 DATED: November 2, 2021

By /s/ Callie Glanton Steele

9 CALLIE GLANTON STEELE
10 Senior Litigator

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