

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

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**UNITED STATES OF AMERICA,**

**v.**

**CONNIE MEGGS,**

**Defendant.**

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**Criminal No. 1:21-cr-00028-APM**

**MOTION TO STRIKE ECF 693**

1. Defendant Connie Meggs, jointly with Defendant Kelly Meggs, by and through the undersigned counsel, respectfully requests that this Honorable Court pursuant to Rule 12(b)(1) of the Federal Rules of Criminal Procedure, *Strike the Notice* by Mr. Moseley, ECF 693, filed by former counsel to Mr. Meggs, without any effort to confer, filed in this matter on behalf of Defendants, to include Connie Meggs.
2. The undersigned represents Mr. Meggs, and the court preliminarily granted the undersigned's substitution back on 05/18/22 and the undersigned have since cleared conflicts check by conflicts counsel.
3. Mr. Moseley filed a Withdrawal as counsel for Mr. Kelly Meggs in *U.S. v. Rhodes*, 22cr00015-APM, on May 17, 2022 pursuant to Local Rule 83.6(b) at which time Mr. Moseley noted undersigned counsel as presenting Mr. Meggs. (ECF 143).
4. Mr. Moseley filed ECF 693, a Notice through ECF system on behalf of Defendants, including Connie and Kelly Meggs, without consent, and without any effort to confer before representing to the court through the ECF system that he was filing on behalf of:

*on behalf of Jonathon Moseley by Kelly Meggs As To Thomas Edward Caldwell,  
Donovan Ray Crowl, Jessica Marie Watkins, Sandra Ruth Parker, Bennie Alvin Parker,  
Graydon Young, Laura Steele, Kelly Meggs, Connie Meggs, Kenneth Harrelson, Roberto*

*A. Minuta, Joshua A. James, Jonathan Walden, Joseph Hackett, Jason Dolan, William Isaacs, David Moerschel, Brian Ulrich, James Beeks, Michael L. Greene*

5. At no time has Mr. Moseley represented Connie Meggs.
6. The actual filing appears to be on behalf of himself, but it appears that he filed it through the ECF system using Mr. Kelly Meggs' name and represented further that it was on behalf a group of defendants listed above.
7. Undersigned counsel has attempted to confer with Mr. Moseley immediately upon his filing, at 4:00 PM today, and asked him to withdraw the filing, but has received no response.
8. The government has no objection to the Relief requested in this Joint Motion.

WHEREFORE, Connie Meggs and Kelly Meggs jointly respectfully jointly move that this Honorable Court strike ECF 693 from the Record for both, lacking sufficient effort to confer, and for using the ECF system in Mr. Kelly Meggs' name in the face of a documented withdrawal notice, and the appearance of new counsel, for a filing on behalf of himself.

Dated: June 28, 2022

Respectfully submitted,

/s/ Juli Z. Haller

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*Counsel for Defendant Connie Meggs  
And for Defendant Kelly Meggs*

**CERTIFICATE OF SERVICE**

On June 28, 2022 the undersigned hereby certifies that a true and correct copy of the foregoing was electronically filed and served via the CM/ECF system, which will automatically send electronic notification of such filing to all registered parties.

Respectfully submitted,

/s/ Juli Z. Haller  
Juli Z. Haller