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

UNITED STATES OF AMERICA

v.

**KELLY MEGGS** 

ACCUSED

Styled as <u>USA v. STEWART RHODES</u>, et al. incorporating cases against multiple Defendants

Criminal Case No.

1:22-cr-00015-APM

Previously included within

1:21-cr-00028-APM

Assigned to the Honorable Amit Mehta, District Court Judge

# DEFENDANT KELLY MEGGS' MOTION TO COMPEL PRODUCTIONG OF ORDERED INFORMATION BY U.S. CAPITOL POLICE

COMES NOW Defendant Kelly Meggs, by counsel, and hereby moves the Court for an order to COMPEL the Government, which includes the U.S. Capitol Police to produce the documents previously ordered.

With a looming April 15, 2022, deadline for Rule 12 motions and uncertainty as to when he will be able to file this Notice, Counsel for Meggs believes that unless or until he receives a temporary order of suspension his obligation and duty remains to preserve, advance, and advocate for Kelly Meggs' legal rights for so long as he is able, and that his duties require this.

The Court should either order the issuance of a Rule 17 subpoena to the U.S. Capitol Police or issue an order to compel the production of the documents and information, as further defined in either case by the attached Proposed Order.

ORAL ARGUMENT LIMITED TO SUCCESSOR COUNSEL

Unless successor counsel is available by then, Kelly Meggs waives oral argument. Kelly Meggs reserves the opportunity for successor counsel to request oral argument.

#### CONSULTATION

Defendant, by Kelly Meggs, certifies that this request has been the topic of continuing and extensive consultation with the U.S. Attorney's office since November 2021, and that further consultation would be futile.

Dated: April 13, 2022

7:59 A.M.

RESPECTFULLY SUBMITTED KELLY MEGGS, By Counsel

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#### **CERTIFICATE OF SERVICE**

I hereby certify that on April 13, 2022, I electronically filed the foregoing document with the Clerk of the Court by using the CM/ECF system, which will send a notice of electronic filing to the following CM/ECF participants. From my review of the PACER / ECF docket records for this case that the following attorneys will receive notice through the ECF system of the U.S. District Court for the District of Columbia.

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