

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

UNITED STATES OF AMERICA

Complainant

v.

ELMER STEWART RHODES, III

Defendant

Criminal Case

USA v. STEWART RHODES, et al.

1:22-cr-00015-APM

Honorable Amit P. Mehta,
District Court Judge, Presiding

**NOTICE OF JOINDER OF DEFENDANT ELMER STEWART RHODES
IN MOTION IN LIMINE OF CO-DEFENDANT THOMAS E. CALDWELL**

Defendant Elmer Stewart Rhodes, III (“Rhodes”) hereby respectfully moves the Court and provides notice pursuant to his constitutional rights, civil rights, and rights at law to join in, move the court to grant, and apply to his case Defendant Thomas E. Caldwell’s Motion In Limine To Allow Into Evidence Certain Inconsistent Statements Made By The Government, filed at ECF #299, and hereby moves the Court to grant Caldwell’s motion in each and every subpart considered separately as if the motion had been filed by Rhodes directly.

Rhodes has been informed that this Court by the Honorable Judge Amit Mehta has given guidance that mere notice of joinder in motions is sufficient without consideration of a motion to join in another co-Defendant’s motion.

Where Caldwell’s motion specifically refers to Thomas E. Caldwell, Stewart Rhodes moves the Court to apply the same analysis and requests with regard to Rhodes the same as to Caldwell and in addition to Caldwell specifically.

Consultation with the United States Attorney's Office ("USAO") is unnecessary as the USAO has already given its view to Caldwell in its consultation before Caldwell filed his motion.

Oral argument on Caldwell's motion is requested to the extent not duplicative.

Dated: September 12, 2022

Respectfully Submitted,

/s/ Edward L. Tarpley Jr.

Edward L. Tarpley Jr.
A Professional Law Corporation
LA Bar ID: 12657
819 Johnston Street
Alexandria, Louisiana 71301
Telephone: 318-487-1460
Fax: 318-487-1462
Email: edwardtarpley@att.net

Counsel for Defendant,
Elmer Stewart Rhodes III

CERTIFICATE OF SERVICE

I hereby certify that this document is being filed on this September 12, 2022, with the Clerk of the Court by using the U.S. District Court for the District of Columbia's CM/ECF system, which will send an electronic copy of to the following CM/ECF participants. From my review of the PACER account for this case the following attorneys are enrolled to receive notice and a copy through the ECF system.

Troy A. Edwards, Jr
U.S. ATTORNEY'S OFFICE FOR THE DISTRICT OF COLUMBIA
555 4th Street, NW
Washington, DC 20001
202-252-7081
troy.edwards@usdoj.gov

Jeffrey S. Nestler
U.S. ATTORNEY'S OFFICE
555 Fourth Street NW
Washington, DC 20530
202-252-7277
jeffrey.nestler@usdoj.gov

Kathryn Leigh Rakoczy
U.S. ATTORNEY'S OFFICE FOR THE DISTRICT OF COLUMBIA
555 Fourth Street, NW
Washington, DC 20530
(202) 252-6928
(202) 305-8537 (fax)
kathryn.rakoczy@usdoj.gov

Justin Todd Sher
U.S. DEPARTMENT OF JUSTICE
950 Pennsylvania Avenue NW
Washington, DC 20530
202-353-3909
justin.sher@usdoj.gov

Alexandra Stalimene Hughes
DOJ-Nsd
950 Pennsylvania Ave NW
Washington DC, DC 20004
202-353-0023
Alexandra.Hughes@usdoj.gov

EDWARD L. TARPLEY, JR.