

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA	§	
	§	
v.	§	Case No. 22-cr-15-APM
	§	
ELMER STEWART RHODES, III,	§	
KELLY MEGGS,	§	
KENNETH HARRELSON,	§	
JESSICA WATKINS, and	§	
THOMAS CALDWELL	§	
	§	
	§	
Defendants.	§	

**DEFENDANTS MOTION FOR LEAVE TO FILE AMENDED MEMORANDUM  
OF POINTS AND AUTHORITIES IN SUPPORT OF JOINT MOTION  
FOR JUDGMENT OF ACQUITTAL  
PURSUANT TO RULE 29**

Defendants Stewart Rhodes, Kelly Meggs, Kenneth Harrelson, Jessica Watkins, and Thomas Caldwell, by and through their undersigned counsel, file seek leave to file an Amended Memorandum of Points and Authorities in further support of their Joint Motion for Judgment of Acquittal pursuant to Rule 29 of the Criminal Rules of Procedure for the District of Columbia and substitute as the Memorandum in support of the Motion filed at ECF 432.

Attached hereto as Exhibit A is Defendants Amended Memorandum in Support of the Joint Motion for Judgement of Acquittal pursuant to Rule 29. The Amended Memorandum is edited for efficiency and adds one substantive argument on page 19. Defendants are sending a red line copy to the government.

Respectfully submitted,

/s/ Stanley E. Woodward, Jr.  
Stanley E. Woodward, Jr. (D.C. Bar No. 997320)  
BRAND WOODWARD LAW, LP  
1808 Park Road NW  
Washington, DC 20010  
202-996-7447 (telephone)  
202-996-0113 (facsimile)  
Stanley@BrandWoodwardLaw.com

/s/ Juli Z. Haller\*  
Juli Z. Haller, (DC 466921)  
The Law Offices of Julia Haller  
601 Pennsylvania Avenue, Northwest,  
S. Building, Suite 900  
Washington, DC 20004  
Telephone: (202) 729-2201  
HallerJulia@outlook.com

\*with permission to sign for counsel for each of the defendants.

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the foregoing document was served on all parties via the ECF system:

Date: 31 December 2022

/s/ Juli Z. Haller  
Juli Z. Haller, (DC 466921)  
THE LAW OFFICES OF JULIA HALLER  
601 Pennsylvania Avenue, N.W., Suite 900  
Washington, DC 20004  
202-729-2201 (telephone)  
HallerJulia@outlook.com  
*Counsel for Defendant Kelly Meggs*