

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

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UNITED STATES OF AMERICA	:	
	:	
v.	:	No.: 21-cr-246 (ABJ)
	:	
DANIEL RODRIGUEZ (1)	:	
EDWARD BADALIAN (2)	:	
	:	
Defendant.	:	

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**SUPPLEMENTAL GOVERNMENT EXHIBIT LIST**

Pursuant to this Court’s Order on September 14, 2022 (ECF No. 122) and Minute Order on February 1, 2023, the United States files this supplement to add four additional videos and two transcripts for stipulated testimony to its proposed exhibit list. Exhibits 318 and 319 were inadvertently omitted from the previous list, but have been disclosed in prior discovery. Exhibits 320 and 321 are newly discovered by the government since the previous deadline for exhibits, and have since been provided to defense counsel. Exhibits 1101 and 1102 are transcripts for stipulated testimony, and have been provided to defense counsel. Defense counsel for Mr. Badalian has noted his corresponding objections in the attached list. As the parties anticipate disposition with respect to Daniel Rodriguez, no objections are noted for Mr. Rodriguez on these exhibits. However, should the disposition not be reached, Mr. Rodriguez’s counsel has previously noted their objection to any stipulated testimony; Exhibits 1101 and 1102 would be withdrawn in that instance.

Respectfully submitted,

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