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Attorney for Defendant
EDWARD BADALIAN

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

UNITED STATES OF AMERICA,

Plaintiff

Case Number: 21-cr-246

**DANIEL JOSEPH “DJ” RODRIGUEZ,
(Counts 1, 2, 3, 4, 6, 7, 8, 10)**

**EDWARD BADALIAN
(Counts 1, 2, 3, 10)**

Defendants.

_____ /

EDWARD BADALIAN’S NOTICE OF INTENT

COMES NOW, the Defendant, EDWARD BADALIAN, by and through his undersigned attorney, and files the following Notices:

- 1) Due to the extremely voluminous nature of discovery, which the undersigned has not completely reviewed and analyzed, and the undersigned’s ongoing investigation into the charges in the instant indictment, MR. BADALIAN cannot represent, at this juncture, that he intends to file any motion pursuant to Fed. R. Crim. Proc. 12(b)(3)(B)(i)-(iii) and (v) alleging any defect or defects in the indictment or any

motions to suppress evidence pursuant to Rule 12(b)(3)(C). Since he cannot represent that he intends to file any of the aforesaid motions at this time, MR. BADALIAN has not conferred with the Government concerning a schedule for filing such motions.

- 2) MR. BADALIAN can represent that he intends to file motions alleging improper joinder under Rule 12(b)(3)(B)(iv) or seeking severance of charges or defendants under Rules 12(b)(3)(D) and 14. Said motions may be set within sixty (120) days of the date of this Notice.

I HEREBY CERTIFY that on the 21st day of January, 2022, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system which will send a notice of electronic filing to the following: Kimberly Paschall, Assistant U.S. Attorney, Tara Ravindra Assistant U.S. Attorney.

Respectfully submitted,

/s/ Tigran Martinian

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