UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIAX	
UNITED STATES OF AMERICA	
– against –	NOTICE OF MOTION
JULIAN ELIE KHATER,	Docket No. 21-CR-00222 (TFH)
Defendant.	
X	

PLEASE TAKE NOTICE, that upon the annexed declaration of Chad Seigel, Esq., attorney for defendant Julian Khater, dated April 20, 2021, the accompanying memorandum of law, and upon all papers and proceedings heretofore had herein, the undersigned will move this Court before the Hon. Thomas F. Hogan, United States District Judge, at the United States District Court, 333 Constitution Ave. NW, Washington, D.C. 20001, at a date and time to be fixed by the Court, for an Order:

Granting defendant Julian Khater release pending trial, pursuant to 18 U.S.C. § 3142, together with such other and further relief as this Court may deem just and proper.

Dated: New York, New York April 20, 2021

YOURS, ETC.

JOSEPH TACOPINA, ESQ. CHAD SEIGEL, ESQ. Tacopina Seigel & DeOreo Attorneys for Defendant *Julian Khater* 275 Madison Avenue, 35th Floor New York, N.Y. 10016 Tel: (212) 227-8877 ALVIN H. THOMAS, JR., ESQ. Law Office of Alvin H. Thomas Jr., PLLC Attorney for Defendant *Julian Khater* 938 E. Swann Creek Road, #325 Fort Washington, MD. 20744 Tel: (301) 203-0893

TO: Clerk of the Court
United States District Court
for the District of Columbia
United States District Court
333 Constitution Ave. NW
Washington, D.C. 20001

Hon. Thomas F. Hogan United States District Court for the District of Columbia United States District Court 333 Constitution Ave. NW Washington, D.C. 20001

AUSA Anthony F. Scarpelli AUSA Gilead I. Light U.S. Attorney's Office for the District of Columbia 555 Fourth Street, NW Washington, D.C. 20530