

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY
CAMDEN VICINAGE
HONORABLE KAREN M. WILLIAMS**

UNITED STATES OF AMERICA :

 v. :
 Criminal No. 24-267 (KMW)
JAMES WESSELS, :

 Defendant. :

TO: Daniel A. Friedman,
Assistant United State's Attorney
United States Attorney's Office
410 Market Street, Fourth Floor
Camden, New Jersey 08101

OMNIBUS NOTICE OF MOTION

PLEASE TAKE NOTICE that on Tuesday, March 12, 2025 at 2:00 p.m., or as soon thereafter as counsel may be heard, James Wessel, through his attorney, Mark W. Catanzaro, Esquire, shall move before the Honorable Karen M. Williams, United States District Court Judge, United States District Court for the District of New Jersey, Mitchell H. Cohen Building and U.S. Courthouse, 4th and Cooper Streets, Camden, New Jersey, for an Order:

1. Permitting defendant to Join in the arguments of Ponzo and Compelling Production of Brady Material;
2. Severing Wessels trial from the trial of Adrienne Ponzo;
3. Compelling the Government to Provide a Bill of

Particulars;

4. Permit Wessels to submit additional motions as the review of discovery and production of material warrant; and
5. Join in any motions filed by Ponzo or Rivera that have application to Wessels.

Defendant shall rely upon the Memorandum of Troy Archie, Esquire and the Declaration of Mark W. Catanzaro with regard to the se motions as supplemented by a Memorandum being submitted with this Notice of Motion.

Dated: December 4, 2024

/s/Mark W. Catanzaro
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James Wessels