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UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

(Hon. JANIS L SAMMAR TINO)

UNITED STATES OF AMERICA, Plaintiff, v. DENNY BHAKTA Defendant.	CASE NO. 21 CR 3352-JLS Date: January 21, 2022 Time: 1:30 p.m. **NOTICE OF MOTION AND MOTION TO COMPEL DISCOVERY/PRESERVE EVIDENCE**

TO: RANDY S. GROSSMAN, ACTING UNITED STATES ATTORNEY; ANDREW GALVIN, ASSISTANT UNITED STATES ATTORNEY,

PLEASE TAKE NOTICE that on January 21, 2022 at 1.300 p.m. or as soon thereafter as counsel may be heard, the Defendant, DENNY BHAKTA will present the following Motion to Compel Discovery and Preserve Evidence.

Said Motion will be based upon this Notice of Motion, the Motions attached hereto, the Statement of Facts and Points of Authorities filed herewith, as well as any and all other evidence presented at the time of the hearing of said Motions.

Dated: January 2, 2022

Respectfully submitted,

/s/ Sandra Resnick
SANDRA RESNICK
Attorney for Defendant
Denny Bhakta