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DENNY BHAKTA

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

(HONORABLE JANIS L. SAMMARTINO)

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 GRANT THE DEFENSE LEAVE TO FILE FURTHER MOTIONS**

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

PLEASE TAKE NOTICE that on January 21, 2022 at 1:30 p.m., or as soon thereafter as counsel may be heard, Denny Bhakta will move the court to grant leave to file additional motions based on any further discovery which may be received subsequent to the filing of the initial Motion For Discovery.

MOTION

The defendant, DENNY BHAKTA, by and through his attorney, Sandra Resnick, pursuant to the Fifth, and Sixth Amendment to the United States Constitution, the Federal Rules of Criminal Procedure 12(b)(1), 12(b)(3), and 12(b)4), and all other applicable statutes, case law and local rules, hereby moves this Court for an order to:

(1) Grant the defense leave to file further motions.

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THE COURT SHOULD GRANT LEAVE TO FILE FURTHER MOTIONS.

Mr. Bhakta requests leave to file further motions in the event additional discovery gives rise to the need for further pre-trial proceedings. Mr. Bhakta and defense counsel are continuing to receive discovery. This discovery may require the retention of a defense expert to review and analyze data which may result in the filing of additional motions.

CONCLUSION

For the foregoing reasons, Mr. Bhakta respectfully requests that the Court grant leave to file further motions. .

Respectfully submitted,

Dated: January 2, 2022

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