UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
ORLANDO DIVISION

UNITED STATES OF AMERICA

v. CASE NO. 6:21-cr-141-RBD-NWH

EMMET BOWENS

MOTION FOR LEAVE TO AMEND UNITED STATES' WITNESS LIST

The United States respectfully moves for leave of Court to file an amended witness list. The United States filed its witness list on January 16, 2026 (Doc. 217), in accordance with the Court's Pretrial Order (Doc. 211). At the time, the United States listed custodians of records for several businesses and agencies, but did not yet know the name of the specific record custodian that Wells Fargo Bank would provide to testify (Doc. 211 at # 15). Today, Wells Fargo provided a records custodian, Oscar Rodriguez who will testify on behalf of Wells Fargo Bank. The United States respectfully requests leave to file an amended witness list with that name.

The United States also seeks to substitute Barclays Bank employee Phillip Gordon as a substitute records custodian witness for Mike Coverdale (Doc. 211 at #8). Mr. Gordon is a custodian of record who is more readily available than Mr. Coverdale and can authenticate the same bank records (Government Exhibit 10a) that Mr. Coverdale would authenticate.

For the above reasons, the United States respectfully requests that the Court grant leave to file an amended witness list.

The undersigned attempted to contact Defendant about this motion through stand by counsel, however, defendant declined to meet with stand by counsel. Therefore, the undersigned cannot represent Defendant's position on the United States' request.

Respectfully submitted,

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United States Attorney

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U.S. v. Bowens **Case No. 6:21-cr-141-RBD-NWH**

CERTIFICATE OF SERVICE

I hereby certify that on January 22, 2026, a true and correct copy of the foregoing document and the notice of electronic filing were sent to the defendant by email and that copies will also be sent by United States Mail to the following non-CM/ECF participant(s):

Emmet Bowens
Defendant

I further certify that on January 22, 2026, 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:

Michael Nielsen, Esq., Standby Counsel for Emmet Bowens

/s/ *Rachel S. Lyons*
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