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20 December 2023

VIA ECF
George L. Russell, Judge
United States District Court
For the District of Maryland
101 W. Lombard Street
Baltimore, Maryland 21202

RE: *United States v. Ryan Dales*
Case No. GLR-23-206

Dear Judge Russell:

I represent Mr. Dales in the above-captioned indictment. Mr. Dales is charged in a seven count superseding indictment with three entirely separate offenses - different in kind, distant in time and unrelated to each other, but for Dales being the defendant in each. On October 10, 2023, I filed a motion to sever each of these crimes and for separate trials on each. ECF 50. On the same date, I filed a motion to suppress the search on January 20, 2023, on timeliness grounds. The Government has not yet responded to either motion. In addition, to date, no trial date is set in this matter.

I am writing to request that the Court set in a briefing schedule and hearing date for the defendant's pending motions. I believe the Court's decisions on these motions will assist the parties in determining whether a resolution short of trial is possible.

Thank you for your consideration of this request.

Very truly yours,

Richard Bardos, Of Counsel

RBB:rb