UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA

UNITED STATES	)	
	)	
v.	)	
	)	**Case No. 24-cr-180-PTG-2**
RYAN MACAULAY	)	
Defendant	)	
	)	

DEFENDANT MACAULAY'S MOTION TO ADOPT, JOIN, AND CONFORM CO-DEFENDANT RAHBAR'S MOTION FOR ADDITIONAL PEREMPTORY STRIKES

Ryan Macaulay, by and through undersigned counsel, respectfully moves to adopt, join, and conform to specific motions, petitions, and other applications for relief that have been filed by or on behalf of his co-defendant in this case, insofar as they may relate to him.

As such, facts that are contained in the motions filed by Mr. Macaulay's co-defendant are equally relevant and applicable to his case in this prosecution. The legal arguments and authorities outlined in those motions are essentially the same that Mr. Macaulay would have raised had he filed separate motions. Requiring Mr. Macaulay to prepare and file individual motions addressing the same issues would result in redundant and inefficient use of time and resources, as the motions would largely mirror those already filed by his co-defendant.

Motions to adopt, join, and conform are a practical and efficient way to address legal issues common to multiple defendants in a multi-defendant case. Permitting a defendant to adopt, join, or conform to motions filed by a co-defendant eliminates unnecessary duplication of effort when the legal and factual issues overlap. Courts routinely grant motions to adopt, join, or conform where such overlap exists, recognizing the efficiency of addressing shared issues in a unified manner. See, e.g., *United States v. Cawthorn*, 2023 U.S. Dist. LEXIS 96352, *2-3 (D. Md. 2023); *United States v. Fawley*, 2012 U.S. Dist. LEXIS 68649, *4-5 (N.D. W.Va. 2012);

United States v. Kloptoski, 2010 U.S. Dist. LEXIS 1291, *12 (M.D. Pa. 2010). Such motions conserve judicial and party resources by avoiding the filing of duplicative motions and ensuring consistent legal arguments across related defendants.

Mr. Macaulay respectfully requests this Court allow him to adopt the following co-defendant motion previously filed in this matter:

1. Defendant Rahbar's Motion for Additional Peremptory Strikes. *See* Dkt. No. 95.

For the foregoing reasons, Ryan Macaulay respectfully requests that the Court grant this motion to adopt, join, and conform the motions delineated herein.

Respectfully submitted,

/s/

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CERTIFICATE OF SERVICE

I hereby certify that on this 31st day of March, 2025, a true and correct copy of the foregoing Defendant's Motion has been served via CM/ECF to all parties in this matter.

/s/

David Benowitz