

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA

V.

Case No.: 21-cr-78 (EGS)

JOHN SULLIVAN

**MOTION FOR ISSUANCE OF SUBPOENA FOR MATERIAL
WITNESS FOR TRIAL**

Defendant, John Sullivan, by and through undersigned counsel, does hereby request, pursuant to Federal Rule of Criminal Procedure 17, the issuance of a subpoena for Jade Sacker for trial. In support thereof, defendant respectfully sets forth as follows:

1. Trial of this matter is scheduled to commence October 25, 2023.
2. Jade Sacker is a material witness whom defendant seeks to present at trial in support of his defense to the charges in the indictment.
3. Defendant has been deemed eligible for appointed counsel and is without resources.
4. Undersigned counsel has spoken with counsel for Jade Sacker. Ms. Sacker's counsel, Alan Abramson, Esquire, an attorney in New York, has agreed to accept service of the subpoena on behalf of Jade Sacker.

5. Defendant relies upon Federal Rule of Criminal Procedure 17 in seeking the relief requested herein.

WHEREFORE, the foregoing considered, defendant prays this Honorable Court for issuance of a subpoena compelling the attendance of Jade Sacker at trial of this matter. The subpoena is to be served upon Alan Abramson, Esquire, attorney for Jade Sacker, who has agreed to accept service of the subpoena for Ms. Sacker.

Respectfully submitted,

_____/s/_____
Steven R. Kiersh #323329
5335 Wisconsin Avenue, N.W.
Suite 440
Washington, D.C. 20015
(202) 347-0200

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and accurate copy of the foregoing was served, via the Court's electronic filing system, on this the __5th__ day of October, 2023 upon all counsel of record via the Court's electronic filing system.

_____/s/_____
Steven R. Kiersh