

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA,

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**NOTICE OF MOTION
20-cr-00585-ALC**

v.

RONALD ROMANO,

Defendant.

PLEASE TAKE NOTICE that the defendant Ronald Romano will move this Court before the Honorable Andrew L. Carter, United States District Judge, Southern District of New York, at a time that is convenient for the Court, for an Order Granting the following relief:

- (1) For an Order Dismissing the Indictment pursuant to Fed. R. Crim. P. 12(b), or in the alternative, granting the defendant a Bill of Particulars pursuant to Fed. R. Crim. P. 7(f);
- (2) For an Order to suppress defendant’s statements made to law enforcement officials, or in the alternative granting the defendant a hearing on the issue;
- (3) For an Order directing disclosure of all material tending to exculpate the defendant, as well as material that would substantially impeach the credibility of Government witnesses, pursuant to Brady v. Maryland, 373 U.S. 82 (1963), Kyles v. Whitley, 514 U.S. 419 (1995), and Giglio v United States, 405 U.S. 150 (1972);
- (4) For an Order directing early production of Jencks Material;
- (5) For an Order directing production of evidence admissible to attack the credibility of co-conspirator declarants not called as witnesses;
- (6) For an Order directing disclosure of co-conspirator statements;
- (7) For an Order precluding admission of co-conspirator hearsay statements;

- (8) For an Order directing to the defendant any and all evidence to attack the credibility of co-conspirator declarants not to be called as witnesses;
- (9) For an Order directing disclosure to the defendant of any and all acts for which the Government would seek to introduce against the defendant pursuant to Fed. R. Crim. P. 404(b) in such sufficient and reasonable time that the defendant may make a 404(b) motion to preclude the introduction of such evidence;
- (10) For an Order permitting defendant to make additional motions as may be appropriate; and
- (11) For such other and further relief as to this Court may seem just and proper.

Dated: October 22, 2021
Staten Island, New York

Yours, etc.

/s/ Mark A. Macron
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TO:

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