

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

United States of America

v.

Sean Combs,

Defendant.

24 Cr. 542 (AS)

NOTICE OF MOTION FOR AN EVIDENTIARY HEARING

PLEASE TAKE NOTICE THAT, upon the Declaration of Marc A. Agnifilo, Esq. dated October 9, 2024, the exhibits attached thereto, and the accompanying Memorandum of Law, defendant Sean Combs by and through his undersigned attorneys, will move this Court at the United States Courthouse, 500 Pearl Street, New York, N.Y., 10007 at a date and time to be determined by the Court, for an Order granting the following relief:

- (1) an evidentiary hearing to examine government misconduct in connection with the leaks;
- (2) discovery of emails, documents and records in the possession of the government (including DHS) related to these leaks;
- (3) a gag order prohibiting government personnel from disclosing any evidence or investigative material related to this case to any member of the media; and
- (4) suppression of any evidence leaked by government employees in violation of Federal Rule of Criminal Procedure 6(e) or any other law, rule, or regulation.

Dated: October 9, 2024

Respectfully submitted,

AGNIFILO INTRATER LLP

/s/

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