

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA

v.

CESAR HUMBERTO PINA,

Defendant.

:
: Hon. Matthew W. Brann, U.S.D.J.

:
: Crim. No. 25-436

:
: **NOTICE OF MOTION**

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TO: Mark E. Coyne, AUSA
United States Attorneys' Office
970 Broad Street
Newark, New Jersey 07102

PLEASE TAKE NOTICE that Defendant Cesar Pina hereby moves to disqualify Assistant U.S. Attorneys Philip Lamparello, Jordan Fox and Ari Fontecchio from managing the U.S. Attorney's Office for the District of New Jersey and from supervising the Government's conduct in the above-captioned matter.

PLEASE TAKE FURTHER NOTICE that in support of this Motion, Defendant adopts and relies on the briefs and arguments of defense counsel in the matters of *United States of America v. Raheel Naviwala*, Crim. No. 24-099 (MWB) and *United States of America v. Daniel Torres*, Crim. No. 24-378 (MWB) in support of their motions seeking the same or similar relief.

Respectfully Submitted,
/s/ Gerald Krovatin
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