

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

UNITED STATES OF AMERICA	:	
	:	
v.	:	Case No. 23-cr-69-CKK
	:	
ISAAC THOMAS,	:	
CHRISTINA LEGROS	:	
Defendants.	:	

PROPOSED PRETRIAL SCHEDULING ORDER

The United States, in conference with Defendant Thomas, seeks an order governing the pretrial schedule in Defendant Thomas’s prosecution as follows:

Proposed Deadlines

Discovery & Associated Deadlines

Government to complete any final discovery under present indictment	December 15, 2023
Aspirational date for grand jury decision re: superseding indictment	December 15, 2023
Government to complete discovery under any superseding indictment	January 5, 2023
Discovery motions (Fed. R. Crim. P. 16)	January 12, 2023

Expert Notices & Other Crimes Evidence

Government’s expert notice (FRE 701 & 702)	January 5, 2023
Defendant’s expert notice (FRE 701 & 702)	January 19, 2023
Government’s FRE 404(b) notice	January 19, 2023
Defendant’s response to FRE 404(b) notice	February 2, 2023
<i>Brady</i> notice	

Experts

Expert reports (FRE 702)	January 19, 2023
Lay witness identification and subject matter	February 23, 2023

Non-Evidentiary Pretrial Motions

Defendant’s non-evidentiary pretrial motions such as motion challenging the indictment	January 19, 2023
Government’s response to Defendant’s non-evidentiary motions	February 2, 2023
Defendant’s reply to non-evidentiary motions	February 9, 2023

Government’s non-evidentiary pretrial motions	January 26, 2023
Defendant’s response to non-evidentiary pretrial motions	February 9, 2023

Government's reply to non-evidentiary pretrial motions	February 16, 2023
<u>Evidentiary Pretrial Motions</u>	
Defendant's evidentiary pretrial motions, Such as motions to suppress evidence, or <i>Daubert</i>	February 9, 2023
Government's response to Defendant's evidentiary motions	February 23, 2023
Defendant's reply as to evidentiary motions	March 1, 2023
Government's evidentiary pretrial motions Such as <i>Daubert</i> and other crimes (404(b))	February 16, 2023
Defendant's response to Government's evidentiary motions	March 1, 2023
Government's reply as to evidentiary motions	March 8, 2023
<u>Motions in Limine</u>	
Motions <i>in limine</i> by both sides	February 16, 2023
Responses to motions <i>in limine</i>	March 1, 2023
Replies as to motions <i>in limine</i>	March 8, 2023
<i>Giglio, Jencks</i> , and Rule 26.2 material	March 11, 2023
<u>Hearings</u>	
Status Hearing	March 13, 2023

Respectfully submitted,

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