

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

UNITED STATES OF AMERICA	:	
	:	
v.	:	Case No. 21-CR-175 (TJK)
	:	
ETHAN NORDEAN, et al.,	:	
	:	
Defendants.	:	

GOVERNMENT’S STATUS REPORT REGARDING MOTIONS

The United States of America, by and through undersigned counsel, respectfully submits this status report in response to the Court’s Minute Order entered on June 10, 2022, directing the parties to file “status report or reports indicating what pretrial motions each party anticipates filing and whether the motion will require testimony.” In response to that order, the government hereby notifies the Court and parties as follows:

The government anticipates that it will file motions *in limine* that do not require testimony. The government anticipates that these motions will fall into four categories: (1) motions to preclude various evidence and arguments that the government believes would be irrelevant or improper, *e.g.*, self-defense, entrapment by estoppel, jury nullification, and improper character evidence; (2) to admit statements; (3) to admit video, audio, and similar evidence; and (4) motions *in limine* specific to the events of January 6th, *e.g.*, regarding the location of closed-circuit cameras, the restricted area, and to limit cross-examination of a Secret Service witness.

As the government continues to prepare for the motions deadline, if it identifies any other categories of motions or identifies any motions it will file that require testimony, it will so notify the Court and the parties.

Respectfully submitted,

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