

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION

UNITED STATES OF AMERICA

vs.

Case No: 21-cr-00348-SCB

JEREMY BROWN

DEFENSE'S RESPONSE TO USA'S MOTION
TO USE "SILENT WITNESS RULE"

COMES NOW, the Defendant, Jeremy Brown, by and through undersigned counsel, hereby respectfully responds to the United States' Motion as follows:

At a status check on September 21, 2022, the procedures for the Silent Witness Rule were discussed amongst the Court, Defense Counsel, and the Government. The Defendant was present at the status check via video, as were all other parties.

At that time, the Defense indicated it had no objection to the procedures for the Silent Witness Rule. In particular, it was discussed that the jury would see unredacted evidence in the courtroom and would have access to unredacted evidence during deliberations upon their request.

Redacted copies of the evidence would go with the jurors to take with them during deliberations. Additionally, Defense counsel and the Defendant will have unredacted copies of the evidence during the relevant portion of the trial. Finally, Defense counsel is permitted to cross-examine the Government's witness about the evidence.

WHEREFORE, the Defense respectfully submits this Response, consistent with what was discussed at the status check.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was furnished to the Clerk of Court for e-filing and service on all interested parties on this 12 day of September, 2022.

Respectfully submitted,

/s/ Roger Futerman

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