

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
TAMPA DIVISION

UNITED STATES OF AMERICA

vs.

Case No: 21-cr-00348-SCB

JEREMY BROWN

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DEFENSE'S RESPONSE TO USA'S 404(b) MOTION (Document 216)

COMES NOW, the Defendant, Jeremy Brown, by and through undersigned counsel, hereby respectfully responds to the United States' Motion, Document 216, as follows:

At a status check on September 21, 2022, the Court stated that the evidence would not be admissible unless the Defendant or Defense witnesses opened the door with testimony to the effect of "the Defendant had an unblemished military record" or equivalent character-type of statements.

The Defendant understands and agrees with the Court's analysis on this issue. The Defense does not expect testimony that would open the door to this otherwise inadmissible 404(b) 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 22<sup>nd</sup> day of September, 2022.

Respectfully submitted,

*/s/ Roger Futerman*

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