

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
TAMPA DIVISION

UNITED STATES OF AMERICA

vs.

Case No: 21-cr-00348-SCB

JEREMY BROWN  
\_\_\_\_\_ /

**DEFENSE NOTICE OF WITHDRAWAL OF DEFENSE EXPERT  
ROBERT HENRY AND REQUEST FOR PROTECTION FROM ANY  
COURT HEARINGS NOVEMBER 23-25, 2022**

COMES NOW, Counsel for Mr. Brown respectfully notifies this Honorable Court that the Defense is no longer calling Defense expert Robert Henry as a witness for a variety of tactical reasons. Counsel has confirmed with Assistant United States Attorney Daniel Marcet that the Government will call a trace report fact witness as well as two explosive experts Travis McCrady and Kerri Giroux. The Defense, upon consideration, now fully expects to elicit the required testimony at trial through cross and direct examination.

This Honorable Court set a hearing for November 23, 2022 at 10:00 a.m. to litigate the matter and ordered counsel to respond by November 7, 2022

to the Government's motion on the issue of Mr. Henry testifying. Counsel thus respectfully submits this pleading in lieu of that response. The Defense will wait for confirmation from the Court that the hearing is no longer needed and a written response is now moot.

**REQUEST FOR PROTECTION FROM ANY COURT HEARINGS**  
**NOVEMEBER 23-25, 2022**

Counsel was scheduled to accompany his wife and 18-month-old daughter to visit his wife's family in Altoona, Pennsylvania for Thanksgiving. This is an annual Thanksgiving trip that has repeated itself for Counsel for eight years. Almost all of lead Counsel's wife's family will be celebrating, as per their tradition, in Altoona for Thanksgiving. Counsel was intending to fly the night of Tuesday November 22, 2022 returning Saturday November 26, 2022. Door to door from Tampa to Altoona is an approximate six-hour trip. Thus, lead Counsel for Mr. Brown respectfully requests protection for Wednesday November 23 and Friday November 25, 2022.

**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 26<sup>th</sup> day of October, 2022.

Respectfully submitted,



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& Associates**

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