

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

UNITED STATES OF AMERICA :
 :
 v. : **Case No. 21-CR-594 (TSC)**
 :
JOSHUA DILLON HAYNES :
 :
 Defendant. :

STIPULATED SCHEDULING ORDER

The United States of America, with concurrence of defense counsel, hereby respectfully submits this stipulated scheduling order to the Court regarding the above-captioned case.

A. Background

The defendant was charged by complaint in June 2021. The arrest warrant was executed in July 1, 2021, and the defendant made an initial appearance in the District of Columbia on July 8, 2021. He was indicted by a federal grand jury in the District of Columbia on September 22, 2021.

Haynes was arrested on a state felony charge in July 2021, and was incarcerated in the Commonwealth of Virginia until his trial date on April 4, 2022. He finished serving his sentence on the Virginia state charges in mid-April, and was transferred to federal custody at which time he made his appearance on the indictment in this matter on May 4, 2022. The defendant is detained.

A trial date has been set for November 14. The parties were ordered to submit a joint schedule for motions and pre-trial hearings by July 11.

B. Proposed Pre-Trial Deadlines

1. The parties shall file any motion pursuant to Federal Rule of Criminal Procedure 12(b)(3)(A)–(D) on or before **September 30, 2022**; oppositions shall be filed on or before **October 14, 2022**; and replies shall be filed on or before

October 21, 2022.

2. The United States shall make any required expert disclosures pursuant to Rule 16(a)(1)(G) by **October 7, 2022**; any reciprocal expert disclosure by Defendant pursuant to Rule 16(b)(1)(C) shall be made by **October 28, 2022**.
3. The United States shall notify Defendant of its intention to introduce any Rule 404(b) evidence not already disclosed on or before **September 30, 2022**.
4. Except where otherwise noted in this Pretrial Order, motions in limine shall be filed on or before **October 14, 2022**; oppositions shall be filed on or before **October 28, 2022**; and replies shall be filed on or before **November 4, 2022**. If the United States wishes to file a motion in limine with respect to any defense expert, it may do so by filing a motion by **October 7, 2022**; any opposition to such motion shall be filed by **October 14, 2022**.
5. Defendant shall satisfy his reciprocal discovery obligations, if any, under Rule 16(b) (except as to experts, as noted above) by **September 30, 2022**. The court will consider any motion in limine with respect to reciprocal discovery after such discovery is received. Any such motion shall be filed by **October 14, 2022**; any opposition to such motion shall be filed by **October 28, 2022**.
6. The parties request that a hearing be scheduled to present argument as to any motions filed pursuant to paragraphs 4 and 5 the week of **October 31**.
7. On or before **November 4, 2022**, counsel shall file a Joint Pretrial Statement that contains the following:
 - a. Proposed voir dire questions.
 - b. Proposed jury instructions.

- c. List of witnesses.
 - d. Exhibit lists.
 - e. Stipulations.
 - f. Proposed verdict form.
8. The United States will endeavor to make grand jury and Jencks Act disclosures as to each witness it expects to call in its case-in-chief on or before **November 4, 2022**. Any *Brady* material not already disclosed also must be disclosed by this date.

Respectfully submitted,

COUNSEL FOR THE GOVERNMENT

MATTHEW GRAVES
United States Attorney
DC Bar No. 481052

By: /s/Jennifer Leigh Blackwell
Jennifer Leigh Blackwell
Assistant United States Attorney
D.C. Bar No. 481097
Phone: (202) 803-1590
Jennifer.blackwell3@usdoj.gov

COUNSEL FOR THE DEFENDANT

/s/ Steven Kiersh (by JLB)
Steven R. Kiersh#323329
5335 Wisconsin Avenue, N.W.
Suite 440
Washington, D.C. 20015
(202) 347-0200