

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

UNITED STATES OF AMERICA	:	
	:	No. 21-cr-508-01-BAH
	:	
v.	:	
	:	
LUKE WESSLEY BENDER,	:	
<i>Defendant.</i>	:	

**DEFENDANT’S RESPONSE TO
GOVERNMENT’S *UNOPPOSED MOTION IN LIMINE*
REGARDING CROSS-EXAMINATION OF SECRET SERVICE WITNESSES**

Defendant, Luke Wessley Bender, through undersigned counsel, files this brief response to the Government’s *Unopposed Motion In Limine* Regarding Cross-Examination of Secret Service Witnesses to note that as undersigned counsel explained to Government counsel, Defendant does not oppose the Government’s motion so far as the relief sought by the Government is limited to the Court’s sound and appropriate resolution of an identical motion filed in *United States v. Lindsey*, 21-cr-162-BAH (Mar. 25, 2022 Min. Order), wherein, the Court ruled that: “defendant is precluded from cross-examining any Secret Service witness about (1) the specific location to which the Vice President, his family, and motorcade were taken once the riot at the U.S. Capitol on January 6, 2021 began, (2) any Secret Service protocols related to the locations where protectees or their motorcades are taken when emergencies occur, and (3) details about the nature of Secret Service protective details.” With that caveat, the Defendant does not otherwise oppose the Government’s motion *in limine* on this issue.

Dated: October 3, 2022

Respectfully submitted,

SILVERMAN|THOMPSON|SLUTKIN|WHITE, LLC

/s/ Christopher Macchiaroli

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