

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

UNITED STATES OF AMERICA,)	
)	
v.)	No. 21-cr-690 (RCL)
)	
PHILIP SEAN GRILLO,)	
)	
Defendant)	
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**RESPONSE TO THE GOVERNMENT’S MOTION IN LIMINE REGARDING
EVIDENCE ABOUT THE SPECIFIC LOCATION OF CAPITOL POLICE
SURVEILLANCE CAMERAS**

The United States of America moved *in limine*, pursuant to Fed. R. Evid. 401, 403, and 611(b), for an order precluding the defendant from cross-examining the government witnesses regarding the “exact locations of Capitol Police surveillance cameras” or introducing maps that show “the “specific position of U.S. Capitol Police surveillance cameras.” *See* Gov’t Mot., ECF No. 50. At this time, the defendant does not intend to cross-examine witnesses regarding the specific locations of the U.S. Capitol Police surveillance cameras or to introduce maps depicting the specific locations or positions of such surveillance cameras. However, being unaware of the government’s presentation of evidence, the defense cannot foreclose the possibility it will become relevant on cross-examination. The defense will advise the government and Court if it intends on eliciting such testimony based on any new development.

Respectfully submitted,

By: /s/ Michael Padden

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