

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA	:	
	:	CASE NO. 1:21-CR-312 (JEB)
v.	:	
	:	
BRADLEY BENNETT,	:	
	:	
Defendant.	:	

GOVERNMENT’S RESPONSE IN OPPOSITION
TO DEFENDANT’S MOTION TO COMPEL
DISCLOSURE OF MATERIALS PURSUANT TO *BRADY V. MARYLAND*

The United States, by and through undersigned counsel, respectfully opposes Bennett’s Motion to Compel Production of Materials pursuant to *Brady v. Maryland*, 373 U.S. (1963). Specifically, Bennett moves to compel the disclosure of witnesses interviews and “tipsters.” *See* ECF No. 98 at 1. This request is broad, vague, and concerns information that has already been provided. The Court should therefore deny the motion.

All witness interviews and “tips” are not *Brady* material. Known witness interviews and “tips” that relate specifically to the defendant has been produced in case specific discovery. The government originally produced case specific discovery to the defendant via counsel on March 23, 2023, and reproduced it on July 17, 2023. This discovery production included witness interviews and notes from those interviews.

The government also filed memorandums regarding the status of discovery since 2021, detailing the expansive efforts of producing global discovery to the defendant. ECF Nos. 30, 46, 54, 55, and 63. The government has endeavored to comply with our requirements under *Brady v. Maryland*. The government has requested reciprocal discovery but has not received any at the time of this filing. To the extent that the defendant is asking for *Brady* material, we ask the court to deny this request as moot. We also ask the court to set a reciprocal discovery production schedule with a

deadline of October 10, 2023, for reciprocal discovery from the defendant.

CONCLUSION

For the aforementioned reasons, the defendant's motion to compel discovery under *Brady v. Maryland* should be denied as moot.

Respectfully submitted,

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