

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

UNITED STATES OF AMERICA,	:	
	:	
v.	:	No. 1:21-cr-00447-CJN-03
	:	
JOSHUA CHRISTOPHER DOOLIN,	:	
et al.	:	

**DEFENDANT JOSHUA CHRISTOPHER DOOLIN'S
MOTION TO COMPEL DISCOVERY WITH INCORPORATED
MEMORANDUM OF POINTS AND AUTHORITIES**

COMES NOW Defendant, Joshua Christopher Doolin, by and through undersigned counsel, and pursuant to Local Rule 5.1 and *Brady v. Maryland*, 373 U.S. 83, 87, (1963), hereby respectfully moves this Honorable Court for the entry of an Order compelling the government to immediately disclose information in its possession as to detailed information as to the identity of a Mr. Stephen Bradshaw. As grounds the following is stated:

1. On February 13, 2023, I asked¹ AUSA Benet Kearney to identify a potential defense witness, who is referred to in a government produced 302. (File # 89B-WF-3373679, 89B-WF-3368293-80_AFO_Stager) (copy attached as an exhibit) This person was interviewed by the FBI on January 19, 2021, in connection with the events of January 6, 2021. It is my professional opinion that Mr. Bradshaw may

¹ All communications between myself and AUSA Kearny concerning this discovery issue are by e-mail unless otherwise noted.

have important and admissible information as it relates to the defense of Joshua C. Doolin.

2. AUSA Kearney responded on February 14, 2023 by providing me information that the person is Mr. Stephen Bradshaw, who is represented by the West End Law Group in Greenwood, SC. Ms. Kearney also provided the names of three lawyers of that law firm.

3. On February 15, 2023, I personally attempted to contact the identified lawyers at West End Law Group, without success. I thereafter asked my investigator (Turner Mebane) to contact the West End Law Group in an effort to discuss with Mr. Bradshaw's lawyer(s) an opportunity to interview him. Mr. Mebane learned that only one of the three lawyers – Christopher Lance Sheek – represented Mr. Bradshaw at the FBI interview on January 19, 2021. However, Mr. Mebane also reports that Mr. Sheek is currently suspended by the South Carolina Bar. (Per the SC Bar Association Website) Mr. Mebane also attempted to reach Mr. Sheek through various other means without success.

4. Since February 15th I have made a few subsequent requests to Ms. Kearney about producing the personal identifying information for Mr. Bradshaw, in my continued efforts to locate him and interview him as a potential defense witness. On March 2, 2023, Ms. Kearney informed me:

“I have not been able to get in touch with Mr. Bradshaw to confirm that he is not represented or that he does not object to my sharing his PII with you. I'm not comfortable sharing that information without a court order.”

WHEREFORE for the foregoing reasons and such other reasons that may appear just and proper, defendant Joshua Christopher Doolin, respectfully requests the entry of an Order compelling the government to immediately disclose information in its possession as to detailed information as to the identity of a Mr. Stephen Bradshaw

Respectfully Submitted,

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Counsel for Mr. Joshua C. Doolin

Dated: March 2, 2023

CERTIFICATE OF SERVICE

I hereby certify that on the 2nd day of March, 2023, copies of the foregoing Motion for to Compel Discovery, and a proposed Order, were served to case registered parties by CM/ECF.

Allen H. Orenberg, # 395519