

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA :
 :
 v. : Case No. 21-cr-398-BAH
 :
 JAMES MCGREW, :
 :
 Defendant. :

JOINT STATUS REPORT

The United States of America and the defendant, James McGrew, through his counsel, submit this joint status report with proposed trial dates for the Court. In order of preference, the parties request the following trial dates:

1. August 28, 2022¹
2. July 18, 2022
3. June 13, 2022

The parties further anticipate the filing of the following defense motions prior to trial:

1. Motion to Dismiss the 18 U.S.C. §§ 1512, 2 Charge
2. Motion to Dismiss the 18 U.S.C. §§ 1752(a)(1) & (b)(1)(A), 1752(a)(2) & (b)(1)(A) and 1752(a)(4) & (b)(1)(A) Charges
3. Motion to Dismiss the 18 U.S.C. § 231(a)(3) Charge
4. Bill of Particulars
5. Motion to Request the Disclosure of Informants
6. Motion to Suppress Evidence
7. Various motions *in limine* prior to trial

The defendant reserves the right to file additional pretrial motions based on a review of all discovery which continues to be produced by the government.

The government intends to file the following motions *in limine* before trial, but reserves the right to supplement the list:

¹ The parties selected the following date in part due to the defense attorney's trial schedule prior to August 2022. Specifically, the defense attorney anticipates that he will be on 2 to 3 trials on other civil and criminal matters prior to August. The government attorney will be on leave until June 2022. Accordingly, the parties are requesting a date in late summer.

1. Motion *in Limine* Regarding Authentication of Video Evidence
2. Motion *in Limine* to Limit the Cross-Examination of Witness Within the United States Secret Service Agency

Respectfully submitted,

JAMES MCGREW,

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CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and by regular mail to the participants who do not receive electronic filing.

/s/ Lucy Sun
Lucy Sun
Assistant U.S. Attorney

Date: December 20, 2021