

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

UNITED STATES OF AMERICA	:	
	:	
v.	:	Case No. 21-CR-38 (CRC)
	:	
RICHARD BARNETT,	:	
	:	
Defendant.	:	

JOINT NOTICE OF TRIAL AVAILABILITY

The United States of America, by and through its attorney, the United States Attorney for the District of Columbia, and the Defendant, by and through his attorneys (collectively, “the parties”), respectfully submit this joint notice in response to the Court’s November 23, 2022 Minute Order.

The parties have conferred to find a mutually available date to reschedule the pending trial. The parties have identified the week of January 9, 2023 as the preferred date in which they are mutually available, as well as the week of January 16, 2023 as an alternative.

In an attempt to minimize the burden on the Court’s calendar and the jury, the parties have discussed the possibility of stipulating to certain undisputed facts in an effort to streamline the trial. The parties hope to arrive at such stipulations in advance of the trial in the interest of judicial economy.

The parties agree that the remaining pretrial deadlines should accordingly be reset as follows:

- The parties shall exchange exhibit lists and identify all expert witnesses no later than 21 days before trial;
- The parties shall file objections to the admissibility of any exhibits within 3

business days after receipt of exhibit list;

- The parties shall jointly submit a short narrative description of the case, to be read to the prospective jurors, and proposed voir dire questions no later than 21 days before trial;
- The parties shall file proposed jury instructions and a proposed verdict form— jointly to the extent possible – no later than 14 days before trial; and
- The government shall provide its list of witnesses no later than 3 business days before trial.

Respectfully submitted,

FOR THE DEFENDANT

/s/ Joseph D. McBride
JOSEPH D. MCBRIDE
Attorney for Richard Barnett
The McBride Law Firm, PLLC
NY Bar No. NY0403
99 Park Avenue, 25th Floor
New York, NY 10016
jmbride@mcbritelawnyc.com
(917) 757-9537

JONATHAN GROSS
2833 Smith Ave., Suite 331
Baltimore, MD 21209
DC Bar No. 1601102
jon@clevengerfirm.com
(442) 813-0141

FOR THE UNITED STATES

/s/ Alison B. Prout
ALISON B. PROUT
Assistant United States Attorney
Georgia Bar No. 141666
75 Ted Turner Drive, SW
Atlanta, Georgia 30303
alison.prout@usdoj.gov
(404) 581-6000

NATHANIEL K. WHITESEL
Assistant United States Attorney
DC Bar No. 7563686
601 D Street, NW
Washington, DC 20530
nathaniel.whitesel@usdoj.gov
(202) 252-7035