

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

UNITED STATES OF AMERICA,

v.

MARK SAHADY,

Defendant.

Case No. 21 CR 134 (CJN)

Honorable Carl J. Nichols

JOINT MOTION FOR AMENDED PRETRIAL SCHEDULE

The United States of America, by and through its attorney, Matthew M. Graves, the United States Attorney for the District of Columbia, and the defendant, Mark Sahady, by and through his attorney, Blake Weiner, hereby respectfully submit a joint proposed amended pretrial schedule pursuant to this Court's oral request at the April 11, 2023 status hearing. Consistent with the continued trial date of August 21, 2023, the parties agree and request that the pretrial schedule be set as follows:

- Any additional motions *in limine* due by July 24, 2023, responses due by August 7, 2023, and replies due by August 14, 2023
- Notice of 404(b) evidence by the government due by August 11, 2023
- Grand jury, *Brady*, and Jencks Act disclosures by the government due by August 11, 2023
- Joint pretrial statement due by August 14, 2023, which shall include the following:
 - A neutral statement of the case
 - Proposed *voir dire* questions
 - Proposed jury instructions
 - List of witnesses

- Exhibit lists
- Stipulations
- Proposed verdict form
- Pretrial Conference on or after August 17, 2023

Respectfully submitted,

MARK SAHADY
Defendant

MATTHEW M. GRAVES
United States Attorney

By: /s/ Blake Weiner
BLAKE WEINER
Counsel for Mark Sahady
Blake Weiner Law, PLLC
1806 Summit Avenue, Suite 300
Richmond, VA 23230

By: /s/ Kaitlin Klamann
KAITLIN KLAMANN
NATHANIEL WHITESEL
Assistant United States Attorneys
601 D Street N.W.
Washington, D.C. 20530