

**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 attorneys, Eden Quainton and Jonathan Gross, hereby respectfully submit a joint proposed amended pretrial schedule pursuant to this Court's oral request at the September 14, 2023, status hearing. Consistent with the continued trial date of February 26, 2024, the parties agree and request that the pretrial schedule be set as follows:

- Any additional non-dispositive briefing, to include a motion for a bill of particulars, by October 20, 2023, responses due by November 3, 2023, and replies due by November 10, 2023
- Any additional motions *in limine* due by January 29, 2024, responses due by February 9, 2024, and replies due by February 16, 2024
- Notice of 404(b) evidence by the government due by January 29, 2024
- Grand jury, *Brady*, and Jencks Act disclosures by the government due by February 16, 2024
- Joint pretrial statement due by February 16, 2024, 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 February 19, 2024

Respectfully submitted,

MARK SAHADY
Defendant

MATTHEW M. GRAVES
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