

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

	)	
UNITED STATES OF AMERICA,	)	
v.	)	Case No. 21-cr-208 (APM)
THOMAS WEBSTER,	)	
Defendant.	)	
	)	

**PRETRIAL ORDER**

Trial is set to commence in this matter on **April 4, 2022, at 9:30 a.m.**, in **Courtroom 10**.


The following deadlines shall govern pre-trial proceedings:

1. The parties shall file any motion pursuant to Federal Rule of Criminal Procedure 12(b)(3)(A)–(D) on or before **January 31, 2022**; oppositions shall be filed on or before **February 7, 2022**; and replies shall be filed on or before **February 14, 2022**. Counsel shall appear on **February 16, 2022**, at 1:00 p.m., in Courtroom 10 for a hearing on Rule 12 pretrial motions, if necessary.
2. The United States shall notify Defendant of its intention to introduce any Rule 404(b) evidence not already disclosed on or before **March 7, 2022**.
3. Motions in limine shall be filed on or before **March 14, 2022**; oppositions shall be filed on or before **March 21, 2022**; and replies shall be filed on or before **March 28, 2022**.
4. On or before **March 21, 2022**, counsel shall file a Joint Pretrial Statement that contains the following:
  - a. A neutral statement of the case. The parties shall include a neutral statement of the case for the court to read to prospective jurors.

- b. Proposed jury instructions. The parties shall submit a list of all standard jury instructions from the “Red Book” (*Criminal Jury Instructions for D.C.* (Barbara A. Bergman ed., May 2016 ed.)) that they wish to include in the final instructions. The parties need not submit the full text of any standard jury instruction, but should provide the full text of (1) any modified standard jury instruction, with the proposed modification(s) redlined, and (2) any non-standard jury instruction they wish to have the court include. As to each non-standard jury instruction, the sponsoring party should cite legal authority for the proposed instruction, and the non-sponsoring party should state any objection to the instruction, including any proposed modifications.
- c. List of witnesses. The parties shall identify the witnesses that each side anticipates it may call in its case-in-chief. Only upon leave of court and a showing of good cause will a party be permitted to withhold a witness’ identity.
- d. Exhibit lists. The parties shall include an exhibit list that each side anticipates it may introduce in its case-in-chief. The parties need not list any exhibit that might be used for purposes of impeachment. The parties should confer with Courtroom Deputy Jean Claude about the format of the exhibit list. The parties *should not* provide a copy of the exhibits to the court, but must exchange pre-marked exhibits. The parties must be prepared to raise objections to any proposed exhibit at

the Pretrial Conference. The objecting party shall bring three copies of any contested exhibit to the Pretrial Conference.

- e. Stipulations. The parties shall submit a draft of all stipulations.
  - f. Proposed verdict form. The parties shall include a draft verdict form, including any special interrogatories. The draft verdict form should include a date and signature line for the jury foreperson.
5. In addition to filing the Joint Pretrial Statement on **March 21, 2022**, the parties shall transmit, in Word format, an electronic copy of (a) any proposed modification to a standard jury instruction, (b) any non-standard jury instruction, and (c) the verdict form by email to the Courtroom Deputy Jean Claude Douyon at [Jean-Claude Douyon@dcd.uscourts.gov](mailto:Jean-Claude.Douyon@dcd.uscourts.gov)
6. The United States should endeavor to make grand jury and Jencks Act disclosures as to each witness it expects to call in its case-in-chief on or before **March 28, 2022**. Any *Brady* material not already disclosed also must be disclosed by this date.
7. Counsel shall appear on **March 28, 2022**, at 11:30 a.m., in Courtroom 10 for a Pretrial Conference.

  
Amit P. Mehta  
United States District Court Judge

Date: **December 8, 2021**