UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,)
v.) No. 21-cr-305 (JEB)
SARA CARPENTER,)
Defendant)

RESPONSE TO THE GOVERNMENT'S MOTION IN LIMINE REGARDING EVIDENCE ABOUT THE SPECIFIC LOCATION OF CAPITOL POLICE SURVEILLANCE CAMERAS

The United States of America moved *in limine*, pursuant to Fed. R. Evid. 401, 403, and 611(b), for an order precluding the defendant from cross-examining the government witnesses regarding the "exact locations of Capitol Police surveillance cameras" or introducing maps that show "the "specific position of U.S. Capitol Police surveillance cameras." *See* Gov't Mot., ECF No. 52 at 2. The defendant does not intend to cross-examine witnesses regarding the specific locations of the U.S. Capitol Police surveillance cameras or to introduce maps depicting the specific locations or positions of such surveillance cameras. The defendant submits that any order issued by the Court in response to the government's motion be limited to the precise relief requested.

Respectfully submitted,

By: _____/s/ Michelle A. Gelernt

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