

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA :
 :
 v. : Case No. 21-cr-367-RDM
 :
 JALISE MIDDLETON & :
 MARK MIDDLETON, :
 :
 Defendants. :

JOINT PROPOSED PRETRIAL SCHEDULING ORDER

In accordance with the Court’s order at the August 21, 2023, status hearing in this case, the United States, Defendant Jalise Middleton, and Defendant Mark Middleton (hereinafter “the parties”) hereby file this Joint Proposed Pretrial Scheduling Order. Trial in this case is scheduled to commence on **February 5, 2024**. The parties propose the following deadlines for governing pretrial proceedings:

1. The parties shall file any motions pursuant to Federal Rule of Criminal Procedure 12(b)(3)(A)–(D) on or before **November 17, 2023**; oppositions shall be filed on or before **December 1, 2023**; and replies shall be filed on or before **December 12, 2023**. The Court will schedule a hearing on Rule 12 pretrial motions, if necessary.
2. The United States shall make any required expert disclosures pursuant to Rule 16(a)(1)(G) by **December 8, 2023**; any reciprocal expert disclosures by Defendants pursuant to Rule 16(b)(1)(C) shall be made by **December 22, 2023**.
3. The United States shall notify Defendants of its intention to introduce any Rule 404(b) evidence not already disclosed on or before **November 28, 2022**.
4. Except where otherwise noted in the Pretrial Scheduling Order, motions in limine shall be filed on or before **December 1, 2023**; oppositions shall be filed on or before **December 15, 2023**; and replies, if any, shall be filed on or before **December 22, 2023**. If the United States wishes to file a motion in limine with respect to any

defense expert, it may do so by filing a motion by **December 5, 2022**; any opposition to such motion shall be filed by **December 12, 2022**.

5. Defendants shall satisfy their reciprocal discovery obligations, if any, under Rule 16(b) (except as to experts, as noted above) by **December 1, 2023**. The Court will consider any motion in limine with respect to reciprocal discovery after such discovery is received. Any such motion shall be filed by **December 15, 2022**; any opposition to such motion shall be filed by **December 22, 2022**.
6. On or before **December 29, 2023**, the parties shall file a Joint Pretrial Statement that contains the following:
 - a. A neutral statement of the case;
 - b. Proposed voir dire questions;
 - c. Proposed jury instructions;
 - d. Witness lists;
 - e. Exhibits lists;
 - f. Stipulations; and
 - g. A proposed verdict form.
7. On or before **January 22, 2024**, the United States shall disclose all grand jury, Jencks, and Brady materials not already disclosed.
8. The parties shall appear on **January 29, 2024**, at 2:00 pm, in Courtroom 8 for a Pretrial Conference.¹
9. Trial shall commence on **February 5, 2024**.

¹ The Defendants have requested to appear virtually for the Pretrial Conference. The government consents to this request.

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Respectfully submitted,

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