

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA :
 :
 : No. 21-CR-383 (BAH)
 v. :
 PATRICK STEDMAN :

**DEFENDANT STEDMAN’S REPLY TO GOVERNMENT MOTION IN LIMINE
REGARDING CROSS-EXAMINATION OF U.S. SECRET SERVICE WITNESS
(Docket Entry 45)**

This memorandum is in response to the government’s motion in limine to limit the cross-examination of witnesses with the Secret Service Agency, pursuant to Fed. R. Evid. 401, 403, and 611(b), filed at docket entry 45 (DDE 45). Specifically, the government seeks an order

limiting the cross-examination of the Secret Service witnesses to questioning about the function performed by the Secret Service as testified to on direct exam, in this case protecting the Vice President and his family, ... [and] specifically foreclose[ing][Mr. Stedman] from questioning the witnesses about the following:

1. Secret Service protocols related to the locations where protectees or their motorcades are taken at the Capitol or other government buildings when emergencies occur; and
2. Details about the nature of Secret Service protective details, such as the number and type of agents the Secret Service assigns to protectees.

GT Motion at 2 (DDE 45). Mr. Stedman does not presently intend to inquire into those specific details. Mr. Stedman is mindful of what the government contends are security concerns about such information. However, this is the type of evidentiary issue that needs to be determined in

the context of trial and the other evidence that the government presents (testimonial or otherwise) before it properly can be determined.

The Court should deny the government's motion as premature and should reserve any decision on such evidentiary issues *if and when* they arise at trial. Defense counsel of course, considering this motion and the defense position in response, would agree to advise the Court and the government at sidebar before asking questions of the nature sought to be precluded by the government in its motion.

Respectfully submitted,

Law Offices of Rocco C. Cipparone, Jr.

BY: /s/Rocco C. Cipparone, Jr.
Rocco C. Cipparone, Jr., Esquire

CERTIFICATE OF SERVICE

The undersigned certifies that on April 19, 2023, I caused a copy of the within document to be served on all parties listed on the Electronic Case Filing (ECF) System, by means of filing those documents on the ECF system.

Law Offices of Rocco C. Cipparone, Jr.

BY: /s/Rocco C. Cipparone, Jr.
Rocco C. Cipparone, Jr., Esquire