

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA :

: CASE NO. 1:21-cr-00552 (DLF)

:

v. :

:

KENNETH JOSEPH OWEN THOMAS, :

:

Defendant. :

DEFENDANT’S PROPOSED JUSTIFIED-USE-OF-FORCE JURY
INSTRUCTION

COMES NOW, Defendant, KENNETH JOSEPH OWEN THOMAS, (hereinafter, “Defendant” or “Thomas”), by and through undersigned counsel, with this proposed justified-use-of-force jury instruction.

A person is justified in the use of force or threat to use force when and to the extent that he reasonably believes that such conduct is necessary to defend himself or another against the imminent use of unlawful force.

Dated: May 3, 2023

Respectfully Submitted,

/s/ John M. Pierce

John M. Pierce

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Attorney for Defendants

CERTIFICATE OF SERVICE

I, John M. Pierce, hereby certify that on this day, May 4, 2023, I caused a copy of the foregoing document to be served on all counsel through the Court's CM/ECF case filing system.

/s/ John M. Pierce

John M. Pierce