

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA	:	
	:	
v.	:	Criminal Case No.
	:	
KENNETH JOSEPH OWEN THOMAS,	:	1:21-cr-00552 (CRC)
	:	
Defendant	:	

**DEFENDANT’S OBJECTIONS TO GOVERNMENT TRIAL
EXHIBITS**

Defendant KENNETH JOSEPH OWEN THOMAS (“Thomas”), through the undersigned counsel, John L. Pierce, Esq. presents these objections. The defense received the government’s exhibit list at around 9 or 10 am on May 11. However, the defense was locked out of USAfx until around 10. Thus we have less than 2 hours to download the exhibits. The internet speed is insufficient and the first video we tried to download indicates it will take 54 minutes.

Thus, we cannot fully review the government’s exhibits by 12 noon on May 11.

10.1 Mayor curfew order. We object on Rule of completeness grounds. There are redactions of content we don't know about. We demand to see the original document to view context. We also object on hearsay and 403 grounds, in that the document contains false statements ('bricks were thrown').

The Government's Exhibit list is attached, with Defendants objections added.

Date: May 11, 2023

Respectfully Submitted,

/s/ John M. Pierce

John M. Pierce

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Attorney for Defendant

CERTIFICATE OF SERVICE

I hereby certify that, on May 11, 2023, this motion was filed via the Court's electronic filing system, which constitutes service upon all counsel of record.

/s/ John M. Pierce

John M. Pierce