

- a. **A neutral statement of the case.** The Parties shall include a neutral statement of the case for the court to read to prospective jurors.
- b. **Proposed voir dire questions.** The Parties shall indicate the *voir dire* questions on which they agree; and the *voir dire* questions on which they disagree with specific objections and relevant legal authority noted below each disputed question.
- c. **Proposed jury instructions.** The Parties shall submit a list of all standard jury instructions from the “Red Book” (Criminal Jury Instructions for D.C. (Barbara A. Bergman ed., May 2016 ed.)) that they wish to include in the final instructions. Parties need not submit the full text of any standard jury instruction but should provide the full text of (1) any modified standard jury instruction(s), with the proposed modification(s) redlined, and (2) any non-standard jury instruction which they wish to have the court include. As to each non-standard jury instruction, the sponsoring party should set legal authority for the proposed instruction, and the non-sponsoring party should state any objection to the instruction, including any proposed modifications.
- d. **List of witnesses.** The Parties shall identify the witnesses that each side anticipates it may call in its case-in-chief. Only upon leave of court and a showing of good cause will a party be permitted to withhold a witness’s identity.
- e. **Exhibit lists.** The Parties shall include an exhibit list that each side anticipates it may introduce in its case-in-chief. The Parties need not list any exhibit that might be used for purposes of impeachment. The Parties should confer with

Courtroom Deputy Lauren Jenkins about the format of the exhibit list. The Parties should not provide a copy of the exhibits to the court but must exchange pre-marked exhibits. The Parties must be prepared to raise objections to any proposed exhibit at the Pretrial Conference. The objecting party shall bring three copies of any contested exhibit to the Pretrial Conference.

- f. **Stipulations.** The Parties shall submit a draft of all stipulations.
 - g. **Proposed verdict form.** The Parties shall include a draft verdict form, including any special interrogatories. The draft verdict form should include a date and signature line for the jury foreperson.
5. In addition to filing the Joint Pretrial Statement, on **January 2, 2023**, the Parties shall submit, in Word format, an electronic copy of (a) any proposed modification to a standard jury instruction, (b) any non-standard jury instruction, and (c) the verdict form by e-mail to the courtroom deputy at Lauren_Jenkins@dcd.uscourts.gov.
 6. Counsel shall appear on **December 13, 2022**, at 1:00 p.m., by video for a hearing on pretrial motions, if necessary.
 7. In addition, counsel shall appear on **January 9, 2023**, at 1:00 p.m. for a Pretrial Conference in Courtroom 15.

Date: July, 8, 2022.


ROYCE C. LAMBERTH
United States District Judge