

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

UNITED STATES OF AMERICA :
 :
 : **Case No.: 21-cr-719 (JEB)**
 :
 v. :
 :
 CYNTHIA BALLENGER, and :
 CHRISTOPHER PRICE, :
 :
 :
 Defendants. :

JOINT STATUS REPORT

Pursuant to the Court’s November 7, 2022 Minute Order, and the November 7, 2022 status conference, the parties have met and conferred, and report the following. At the November 7 status conference, the Court directed the parties to discuss the United States’ outstanding motion *in limine* to limit cross examination of secret service agency witnesses. *See* ECF No. 51. The parties understood the Court to request that we discuss whether defendants have any opposition to the motion *in limine* and, if so, whether the parties could resolve such opposition.

The parties met on November 16, 2022 to discuss this issue. The parties are in agreement with regard to the United States’ motion. Specifically, the parties agree that defendants should be specifically foreclosed from questioning secret service 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.

See ECF No. 51 at 2.

The parties agree that the scope of the United States' motion *in limine* is limited to that specific request. Defense counsel would like acknowledgment that such limitation does not include issues such as restricted area designation or crowd management protocols. The Government agrees that, per the language of the motion *in limine*, these topics are not encompassed within our motion. Therefore, the parties respectfully request that the Court grant the United States' motion *in limine*.

Respectfully submitted,

DATED: November 21, 2022

MATTHEW M. GRAVES
United States Attorney
D.C. Bar No. 481052

By: /s/ Ashley Akers
ASHLEY AKERS
MO Bar No. 69609
Trial Attorney, Detailee
175 N Street, NE, 9th Floor
Washington, DC 20002
(202) 353-0521
Ashley.Akers@usdoj.gov

ANDREW S. HAAG
Assistant United States Attorney
MA Bar No. 705425
601 D Street, N.W.
Washington, DC 20530
(202) 252-7755
Andrew.Haag@usdoj.gov

Counsel for the United States

/s/ Nandan Kenkeremath
Nandan Kenkeremath
DC Bar 384732
2707 Fairview Court
Alexandria, Virginia 22311
703-407-9407

Counsel for Defendants