

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

UNITED STATES OF AMERICA	:	
	:	
v.	:	Case No. 21-CR-725 (RDM)
	:	
JARED KASTNER,	:	
	:	
Defendant.	:	

JOINT STATUS REPORT

The United States of America, with concurrence of defense counsel, hereby respectfully submits this status report to the Court regarding the above-captioned case.

A. Background

The defendant Jared Kastner and co-defendant Luke Faulkner were charged by complaint on December 7, 2021. Arrest warrants were executed on December 8, 2021. Also, on December 8, 2021, the government filed a criminal information as to Kastner and Faulkner. The defendant and Faulkner made initial appearances in the District of Columbia on December 14, 2021. Time was excluded under the Speedy Trial Act from December 14, 2021, until December 22, 2021. Kastner and Faulkner had a status hearing before the Court on December 22, 2021. Time was excluded under the Speedy Trial Act from December 22, 2021, until March 7, 2022.

Co-defendant Kenneth Massie was charged by complaint on January 27, 2022, and an arrest warrant for Massie was executed on February 8, 2022. Kastner, as well as co-defendants Faulkner and Massie, were charged by superseding information on February 9, 2022. Kastner was arraigned on the superseding information on February 18, 2021. Time was excluded under the Speedy Trial Act from February 18, 2021, until a status hearing on April 20, 2022. Between on April 19, 2021, and October 21, 2021, the Court considered the parties' multiple Joint Status Reports and ordered continuances to allow for continued discovery productions and plea

discussions. Time was excluded under the Speedy Trial Act from April 21, 2021, until the date of a status hearing on October 21, 2022. On October 13, 2022, co-defendant Faulkner entered a guilty plea. On October 21, 2022, co-defendant Massie entered a guilty plea. That same date, October 21, 2022, the Court set a trial date for the defendant of August 8, 2022. The Court ordered the parties to file the attached status report by October 28, 2022, to address motions and other pre-trial deadlines. Time under the Speedy Trial Act has been excluded until the trial date of August 8, 2023.

B. Proposed Pre-Trial Deadlines

1. The parties shall appear for a Pre-trial Conference on **June 21, 2023**.
2. The parties shall file any motion pursuant to Federal Rule of Criminal Procedure 12(b)(3)(A)–(D) on or before **May 19, 2023**; oppositions shall be filed on or before **June 2, 2023**; and replies shall be filed on or before **June 9, 2023**.
3. The United States shall make any required expert disclosures pursuant to Rule 16(a)(1)(G) by **June 2, 2023**; any reciprocal expert disclosure by Defendant pursuant to Rule 16(b)(1)(C) shall be made by **June 16, 2023**.
4. The United States shall notify Defendant of its intention to introduce any Rule 404(b) evidence not already disclosed on or before **June 30, 2023**.
5. Except where otherwise noted in this Pre-trial Order, motions in limine shall be filed on or before **July 14, 2023**; oppositions shall be filed on or before **July 21, 2022**; and replies shall be filed on or before **July 28, 2023**. If the United States wishes to file a motion in limine with respect to any defense expert, it may do so by filing a motion by **July 21, 2023**; any opposition to such motion shall be filed by **July 28, 2023**.

6. Defendant shall satisfy his reciprocal discovery obligations, if any, under Rule 16(b) (except as to experts, as noted above) by **June 30, 2023**. The court will consider any motion in limine with respect to reciprocal discovery after such discovery is received. Any such motion shall be filed by **July 14, 2023**; any opposition to such motion shall be filed by **July 21, 2023**.
7. The parties request that a hearing be scheduled to present argument as to any motions filed pursuant to paragraphs 5 and 6 the week of **July 31, 2023**.
8. On or before **July 28, 2023**, counsel shall file a Joint Pretrial Statement that contains the following:
 - a. Proposed voir dire questions.
 - b. Proposed jury instructions.
 - c. List of witnesses.
 - d. Exhibit lists.
 - e. Stipulations.
 - f. Proposed verdict form.
9. The United States will endeavor to make grand jury and Jencks Act disclosures as to each witness it expects to call in its case-in-chief on or before **July 28, 2023**. Any *Brady* material not already disclosed also must be disclosed by this date.

Respectfully submitted,

COUNSEL FOR THE GOVERNMENT

MATTHEW GRAVES
United States Attorney
DC Bar No. 481052

By: *s/ Will N. Widman* _____

WILL N. WIDMAN

NC Bar No. 48158

Trial Attorney, Detailee

1301 New York Avenue NW, 8th Floor

Washington, DC 20530

(202) 353-8611

Will.Widman@usdoj.gov

COUNSEL FOR THE DEFENDANT

/s/ _____

John M. Pierce

JOHN PIERCE LAW

21550 Oxnard Street 3rd Floor, PMB #172

Woodland Hills, CA 91367

USA

jpierce@johnpiercelaw.com

(213) 279-7846