UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

.

v. : CASE NO. 22-CR-121 (TNM)

:

JARED PAUL CANTRELL,

QUENTIN G. CANTRELL, and ERIC ANDREW CANTRELL,

:

Defendants.

STIPULATED SCHEDULING ORDER

The United States of America, with concurrence of defense counsel, hereby respectfully submits this stipulated scheduling order to the Court regarding the above-captioned case. The Parties note the Court's Standing Order for Misdemeanor Cases Before Judge Trevor N. McFadden ("Standing Order").

A. Background

The defendants were charged by complaint in March 2022. The arrest warrants were executed on March 10, 2022, and the defendants made an initial appearance in the District of Columbia on March 15, 2022. An information was filed in the District of Columbia on April 7, 2022.

A trial date has been set for April 3, 2023. The parties were ordered to submit a joint schedule for motions and pre-trial hearings by July 18, 2022. The Government has substantially completed all "defendant-specific" discovery, and plea offers have been extended by the Government to all defendants.

B. Proposed Pre-Trial Deadlines

1. The parties shall file any motion pursuant to Federal Rule of Criminal

Procedure 12(b)(3)(A)–(D) and any motions in limine or motions in limine with respect to any defense expert report on or before **February 20, 2023**; oppositions shall be filed on or before **March 13, 2023**; and replies shall be filed on or before **March 20, 2022**. The parties note that ECF #33, Motion to Dismiss All Counts Against Quentin G. Cantrell, was filed before the Court's issuance of the Standing Order, and Mr. Quentin G. Cantrell would ask that a schedule be set for it be decided sooner.

- 2. The United States shall make any required expert disclosures pursuant to Rule 16(a)(1)(G) by **January 30, 2023**; any reciprocal expert disclosure by Defendant pursuant to Rule 16(b)(1)(C) shall be made by **February 13, 2023**.
- 3. The United States shall notify Defendant of its intention to introduce any Rule 404(b) evidence not already disclosed on or before **February 4, 2023**.
- 4. Defendant shall satisfy his reciprocal discovery obligations, if any, under Rule 16(b) (except as to experts, as noted above) by February 13, 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 February 20, 2023; any opposition to such motion shall be filed by March 13, 2023.
- The parties request that a hearing be scheduled to present argument as to all motions filed on April 3, 2023.
- 6. All defendants request a bench trial and prefer not to try this before a jury. The parties propose that on or before March 29, 2023, counsel shall file a Joint Pretrial Statement that contains the following:
 - a. Proposed jury instructions.

- b. List of witnesses.
- c. Exhibit lists.
- d. Stipulations.
- 7. 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 April 3, 2023. Any *Brady* material not already disclosed also must be disclosed by this date, in accordance with the Standing Order.

Respectfully submitted,

COUNSEL FOR THE GOVERNMENT

MATTHEW GRAVES United States Attorney DC Bar No. 481052

By: __/s/ Jeffrey A. Kiok_ JEFFREY A. KIOK Attorney Detailed to the U.S. Attorney's Office for the District of Columbia N.Y. Bar No. 5400221 601 D Street, N.W. Washington, DC 20530 Jeffrey.kiok2@usdoj.gov (202) 307-5967

COUNSEL FOR THE DEFENDANTS

By: __/s/_ David Issa DAVID ISSA Texas Bar No. 24069971 Email: davidissa@entraconsulting.com 11300 Richmond Ave. Ste K101 Houston, Texas 77082 Tel. (281)935-2693 Attorney for Defendant QUENTIN G. CANTRELL

By: /s/ David J. Hensel

David J. Hensel, Indiana Atty. No. 15455-49 HOOVER HULL TURNER LLP 111 Monument Circle, Suite 4400 P.O. Box 44989 Indianapolis, IN 46244-0989 (317) 822-4400 dhensel@hooverhullturner.com Attorney for Defendant ERIC ANDREW CANTRELL

By: /s/ Peter A. Cooper
Peter A. Cooper, (#478-082)
400 Fifth Street, NW.
Suite 350
Washington DC 20001
pcooper@petercooperlaw.com
Attorney for Defendant
JARED CANTRELL