

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

v.

BARRY BENNET RAMEY,

Defendant

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Case No. 22-CR-184 (DLF)

**DEFENDANT’S OBJECTIONS TO
GOVERNMENT’S EXHIBIT LIST**

COMES NOW the Defendant, Barry Ramey, by and through counsel, and respectfully submits his objections to the Government’s exhibit list pursuant to Paragraph 7 of the Court’s Pretrial Order dated January 30, 2023.

EXHIBITS

Defendant objects to Government’s proposed Exhibit 1 on the grounds that it is irrelevant, speculative, and lacks foundation. Defendant objects to the Government’s proposed Exhibit 300 due to the audio that can be heard throughout the video as well as the close caption of that audio. Defendant objects to the audio and the close-caption on the basis that is irrelevant to Defendant’s case and the Government will not be able to lay the foundation for the audio or the close-caption. Lastly, Defendant objects to Government’s proposed Exhibits 405-407 as it contains hearsay, it is prejudicial, and contains statement of facts that are not relevant to Defendant’s case.

Defendant reserves the right to object at trial to any proposed Government Exhibit should they fail to lay a proper foundation, or use exhibits for hearsay or any other improper purpose.

Respectfully submitted,

/s/ Farheena Siddiqui

Farheena Siddiqui

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Counsel for Defendant

CERTIFICATE OF SERVICE

I hereby certify that a copy of Defendant's Objections to Government's Exhibits was served upon counsel of record through ECF on the date of filing.

s/ Farheena Siddiqui

Farheena Siddiqui