

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

UNITED STATES OF AMERICA,

v.

HOWARD CHARLES RICHARDSON,

Defendant.

Criminal No. 21-721 (CKK)

PROPOSED PRETRIAL SCHEDULING ORDER

At a Status Hearing on February 7, 2022, the parties discussed with the Court their intention to continue discussions about pretrial disposition of this case. They also reiterated their interest in tentative preparations for trial in the event that plea negotiations do not resolve this case. Pursuant to the Court’s Minute Order of February 7, 2022, the Court issued this template for a proposed Pretrial Scheduling Order. The parties therefore respond.

Plea

Proposed Deadlines

During plea negotiations, the parties shall discuss the statutory penalties and sentencing guidelines that would apply with and without a superseding indictment. This will be discussed on the record as well.

Discovery & Associated Deadlines

Government to complete any final discovery under present indictment	<u>April 1, 2022</u>
Aspirational date for grand jury decision re: superseding indictment	<u>n/a</u>
Government to complete discovery under any superseding indictment	<u>n/a</u>
Discovery motions (Fed. R. Crim. P. 16)	<u>April 29, 2022</u>

Expert Notices & Other Crimes Evidence

Government’s expert notice (FRE 701 & 702)	<u>May 13, 2022</u>
Defendant’s expert notice (FRE 701 & 702)	<u>May 13, 2022</u>
Government’s FRE 404(b) notice	<u>May 13, 2022</u>
Defendant’s response to FRE 404(b) notice	<u>May 25, 2022</u>

Experts

Expert reports (FRE 702)	<u>May 13, 2022</u>
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Lay witness identification and subject matter (FRE 701)	<u>n/a</u>
<u>Non-Evidentiary Pretrial Motions</u>	
Defendant’s non-evidentiary pretrial motions, such as motions challenging the indictment	<u>May 13, 2022</u>
Government’s response to Defendant’s non-evidentiary motions	<u>May 25, 2022</u>
Defendant’s reply as to non-evidentiary motions	<u>June 1, 2022</u>
Government’s non-evidentiary pretrial motions	<u>May 13, 2022</u>
Defendant’s response to Government’s non-evidentiary motions	<u>May 25, 2022</u>
Government’s reply as to non-evidentiary motions	<u>June 1, 2022</u>
 <u>Evidentiary Pretrial Motions</u>	
Defendant’s evidentiary pretrial motions, such as motions to suppress evidence, or <i>Daubert</i>	<u>May 13, 2022</u>
Government’s response to Defendant’s evidentiary motions	<u>May 25, 2022</u>
Defendant’s reply as to evidentiary motions	<u>June 1, 2022</u>
Government’s evidentiary pretrial motions, such as <i>Daubert</i> and other crimes (404(b))	<u>May 13, 2022</u>
Defendant’s response to Government’s evidentiary motions	<u>May 25, 2022</u>
Government’s reply as to evidentiary motions	<u>June 1, 2022</u>
 <u>Motions in Limine</u>	
Motions <i>in limine</i> by both sides	<u>May 13, 2022</u>
Responses to motions <i>in limine</i>	<u>May 25, 2022</u>
Replies as to motions <i>in limine</i>	<u>June 1, 2022</u>
Joint notice of stipulations	<u>June 13, 2022</u>
<i>Giglio</i> and <i>Jencks</i> material	<u>June 13, 2022</u>
<i>Voir Dire</i> and Jury Instructions	<u>June 13, 2022</u>
 <u>Witness and Exhibit Lists</u>	
Government’s witness list, exhibit list and exhibits	<u>June 13, 2022</u>
Defendant’s witness list, exhibit list and exhibits	<u>June 13, 2022</u>

Additional pretrial hearings (to include resolutions of objections to evidence) shall take place as needed on a series of dates to be discussed with the Court.

SO ORDERED.

/s/
COLLEEN KOLLAR-KOTELLY
United States District Judge