

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

UNITED STATES OF AMERICA,

-v-

**RICHARD SLAUGHTER, and
CADEN GOTTFRIED,**

Defendants.

**Criminal No.: 1: 22-cr-00354-RCL-1
and 2**

**DEFENDANTS MOTION IN
LIMINE TO PRECLUDE
GOVERNMENT STATEMENTS
OF MEDICAL INJURIES BY
DEFENDANTS UNLESS TIMELY,
CORROSPONDING, INJURY
REPORTS AND MEDICAL
RECORDS EXIST**

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COMES NOW Defendants Rick Slaughter and Caden Gottfried, by and through undersigned counsel John Pierce, with this motion in limine to preclude any statements, arguments, testimony, or evidence of police injuries unless corresponding, timely, injury reports and medical records are provided in advance through discovery.

Undersigned counsel has previously had Jan. 6 trials in which government witnesses suddenly sprung unannounced claims of injuries. For example, in the Kenneth Joseph Thomas trial before Judge Friedrich, a prosecution claimed he suffered from “post traumatic syndrome disorder” (“PTSD”) due to Mr. Thomas and January 6. That same witness had apparently never before claimed he suffered from PTSD from the event.

PTSD is a serious medical and mental health disorder, which disables an officer and should generally mean the end of that officer’s career as a street cop. Those with PTSD are a danger to both themselves and others.

Moreover, all police training requires that officers must report all injuries as soon as practically possible. This rule protects not only the officer, but the Police Department and the municipality or public employer.

Accordingly, Defendants move for an order precluding the government from presenting police (or other) witnesses who claim to suffer medical harms or mental injuries stemming from the defendants unless those witnesses previously documented their injuries, as the law and policies require, and unless defense counsel has been timely provided with all medical records and statements.

Dated: October 06, 2023

Respectfully Submitted,

/s/ John M. Pierce

John M. Pierce

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Attorney for Defendants

CERTIFICATE OF SERVICE

I, John M. Pierce, hereby certify that on this day, October 6, 2023, I caused a copy of the foregoing document to be served on all counsel through the Court's CM/ECF case filing system.

/s/ John M. Pierce

John M. Pierce