

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

UNITED STATES OF AMERICA

v.

RICHARD SLAUGHTER, and
CADEN PAUL GOTTFRIED,

Defendants.

Crim No. 1:22-cr-00354-RCL

JOINT PROPOSED SCHEDULING ORDER

As discussed at the Status Conference held on June 23, 2023, the parties submit the following proposed Scheduling Order:

1. By **August 25, 2023**: (a) the Government shall notify Defendant of its intention, if any, to introduce any evidence under Federal Rule of Evidence 404(b); (b) Defendant shall notify the United States of its intention, if any, to assert any of the defenses outlined in Federal Rules of Criminal Procedure 12.1, 12.2, and 12.3; and (c) each party shall disclose to opposing counsel a written summary of any testimony that the party intends to use under Federal Rules of Evidence 702, 703, or 705;

2. Defendant shall, by **September 1, 2023**, file any pretrial motions under Federal Rule of Criminal Procedure 12. The Government shall respond to any such motion by **September 22, 2023**, and Defendant shall reply by **September 29, 2023**.

3. The parties shall file any motions in limine by **October 6, 2023**, and any oppositions to the motions shall be filed by **October 20, 2023**.

4. The parties shall file a joint pretrial statement by **November 1, 2023**, which will include:


- a. Proposed jury instructions, indicating:
 - i. The instructions to which the parties agree;
 - ii. The instructions to which the parties disagree, with specific objections noted below each disputed instruction and supporting legal authority (if any); and
 - iii. The proposed instruction's source (e.g., the Red Book, Matthew Bender's Federal Jury Instructions), or, for modified or new instructions, its supporting legal authority;
 - b. A list of expert witnesses, accompanied by a brief description of each witness's area of expertise and expected testimony, followed by specific objections (if any) to each witness;
 - c. A list of prior convictions that the government intends to use for impeachment or any other purpose, followed by specific objections (if any) to that use;
 - d. A list of exhibits that the government intends to offer during trial, with a brief description of each exhibit; and
 - e. Any stipulations executed or anticipated to be executed.
5. The government is available throughout the month of November for the Court to schedule a pretrial conference and motions hearing at its convenience. Defense counsel not indicated any dates they are unavailable.
6. A jury trial shall commence on December 1, 2023, at _____.m.

Respectfully submitted,

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/s/

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