

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA :
 :
 v. : Case No. 23-cr-69-CKK
 :
 ISAAC THOMAS, :
 CHRISTINA LEGROS :
 Defendants. :

PROPOSED PRETRIAL SCHEDULING ORDER

The United States, in conference with Defendant Thomas, seeks an order governing the pretrial schedule in Defendant Thomas’s prosecution as follows:

Proposed Deadlines

Discovery & Associated Deadlines

Government to complete any final discovery under present indictment February 16, 2024
Aspirational date for grand jury decision re: superseding indictment February 16, 2024
Government to complete discovery under any superseding indictment February 23, 2024
Discovery motions (Fed. R. Crim. P. 16) March 1, 2024

Expert Notices & Other Crimes Evidence

Government’s expert notice (FRE 701 & 702) February 23, 2024
Defendant’s expert notice (FRE 701 & 702) March 1, 2024
Government’s FRE 404(b) notice March 8, 2024
Defendant’s response to FRE 404(b) notice March 22, 2024
Brady notice

Experts

Expert reports (FRE 702) March 1, 2024
Lay witness identification and subject matter March 29, 2024

Non-Evidentiary Pretrial Motions

Defendant’s non-evidentiary pretrial motions such as motion challenging the indictment February 23, 2024
Government’s response to Defendant’s non-evidentiary motions March 9, 2024
Defendant’s reply to non-evidentiary motions March 16, 2024

Government’s non-evidentiary pretrial motions February 23, 2024
Defendant’s response to non-evidentiary pretrial motions March 9, 2024

Government's reply to non-evidentiary pretrial motions March 16, 2024

Evidentiary Pretrial Motions

Defendant's evidentiary pretrial motions,
Such as motions to suppress evidence, or *Daubert* April 5, 2024
Government's response to Defendant's evidentiary motions April 19, 2024
Defendant's reply as to evidentiary motions April 26, 2024
Government's evidentiary pretrial motions
Such as *Daubert* and other crimes (404(b)) April 5, 2024
Defendant's response to Government's evidentiary motions April 19, 2024
Government's reply as to evidentiary motions April 26, 2024

Motions in Limine

Motions *in limine* by both sides April 19, 2024
Responses to motions *in limine* May 3, 2024
Replies as to motions *in limine* May 10, 2024

Giglio, Jencks, and Rule 26.2 material May 10, 2024

Hearings

Status Hearing

Respectfully submitted,

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