

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO
Judge Christine M. Arguello**

Criminal Action No.

UNITED STATES OF AMERICA,

Plaintiff,

v.

,

Defendants.

JOINT PROPOSED SCHEDULING ORDER

The parties, through the case Assistant United States Attorney, on behalf of the Government, and attorneys for Defendants, pursuant to this Court's order of _____, hereby jointly file a proposed Scheduling Order proposing deadlines for the filing of pretrial motions in this matter.

Based upon thorough discussion between the parties regarding the time necessary to adequately prepare pretrial motions, the parties respectfully submit the following proposed schedule for the filing of pretrial motions:

- I. Discovery Motions (excluding *Franks* Issues, but Including Disclosure of CHS/CI's and *Brady/Giglio*):
 1. _____ Motion filing Deadline.
 2. _____ Response Deadline.
 3. Generally, no hearing is necessary on Discovery Motions. (The Court will set a Hearing date in accordance with Her Calendar)

- II. Motions challenging Indictment:
 1. _____ Motion filing Deadline.
 2. _____ Response Deadline.

3. Generally, no hearing is necessary on Discovery Motions. (The Court will set a Hearing date in accordance with Her Calendar)

Wiretap and *Franks* Discovery Motions:

1. _____ Motion filing Deadline.
2. _____ Response Deadline.
3. _____ Hearing. (The Court will set a Hearing date in accordance with Her Calendar)

_____ Fed. R. Evid. 609(a)(1) Disclosures due from Government (Re Criminal Convictions)

Motions to Suppress Evidence and Statements

1. _____ Motion filing Deadline.
2. _____ Response Deadline.

_____ Government to submit *James* Hearing Logs

_____ Government to Make Expert Disclosures

_____ : **(Full Day)**: Hearing on Motions to Suppress Evidence. (The Court will set a Hearing date in accordance with Her Calendar)

_____ : Objections to Fed. R. Evid. 801(d)(2)(e) Statements and Motions *in Limine* Re: Expert Disclosures; Motions for Severance

_____ : Response to Motions of Severance

_____ : **(Full Day)**: *James*, *Daubert*, and Severance Hearings. (The Court will set a Hearing date in accordance with Her Calendar)

_____ :

1. Motions *in Limine* per CMA Criminal Practice Standard 12(g)
2. Initial government disclosure of *Jencks* material with additional *Jencks* material to follow due to trial preparation by Government, with rolling *Jencks* production.

_____ : Government Notice re Fed. R. Evid. 404b per Discovery Conference Memorandum

_____ : Motions *in Limine* re Fed. R. Evid. 404b

_____ :

1. Government Witness List due to Chambers per CMA Practice Standards
2. Government Response to Motions *in Limine* per CMA Practice Standards

3. Government and Defense Exhibit Lists due to Chambers per CMA Practice Standards

_____ : Government Response to 404b Motions

_____ : Final Trial Preparation Conference

_____ : Defense Witness Lists due *ex parte* to Chambers per CMA Practice Standards

_____ : Jury Selection

_____ : Beginning of _____-week jury trial.

DATED:

BY THE COURT:

CHRISTINE M. ARGUELLO
United States District Judge