

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

UNITED STATES OF AMERICA)	
)	
v.)	CRIMINAL NO. 20-CR-278-TNM
)	
KEITH BERMAN,)	
)	
Defendant.)	

JOINT PROPOSED SCHEDULE FOR EVIDENTIARY HEARING AND SENTENCING

In an effort to facilitate orderly and efficient proceedings in connection with the sentencing hearing and the March 20, 2024 evidentiary hearing, the Parties, by and through their undersigned counsel, respectfully submit this Joint Proposed Schedule for exchanging disclosures and court submissions:

PROPOSED EVIDENTIARY AND SENTENCING DISCLOSURE SCHEDULE	
Witness disclosures include qualifications, conclusions, reasons and bases for those conclusions	February 20, 2024
Exchange exhibit disclosures, as well as disclosure of any Jencks or Giglio material	March 8, 2024
Simultaneous filings of evidentiary hearing briefs (written submissions)	March 13, 2024
Evidentiary hearing	March 20, 2024
Witness & exhibit disclosures consistent with Fed. R. Crim. Proc. 32(i)(2)	April 6, 2024
Simultaneous filings of sentencing memorandum	April 6, 2024
Sentencing hearing	April 12, 2024

The Parties request the Court approve and adopt the proposed schedule.

Dated: February 14, 2024

Respectfully Submitted,

/s/ Christopher Fenton

Christopher Fenton
Kate T. McCarthy
Matthew Reilly
Trial Attorneys

Fraud Section, Criminal Division
United States Department of Justice
1400 New York Avenue, NW
Washington, DC 20005
(202) 320-0539

/s/ Kevin B. Collins

Kevin B. Collins (D.C. Bar No. 445305)
Nicholas J. Xenakis (D.C. Bar No. 90001123)
Jose J. Ramos (*pro hac vice*)
Covington & Burling LLP
850 Tenth Street, NW
Washington, DC 20001
(202) 662-5598

Michelle Peterson (D.C. Bar No. 438930)
Assistant Federal Public Defender
For the District of Columbia
625 Indiana Avenue, NW
Washington, DC 20004

Counsel for Keith Berman

The parties joint proposed schedule in this case is approved this 14th day of February 2024,

Honorable Trevor N. McFadden
United States District Judge

CERTIFICATE OF SERVICE

I hereby certify that I caused copies of the foregoing to be transmitted to counsel registered to receive electronic service.

Signed,

/s/ Kevin B. Collins

Kevin B. Collins (D.C. Bar No. 445305)

Nicholas J. Xenakis (D.C. Bar No. 90001123)

Jose J. Ramos (*pro hac vice*)

Covington & Burling LLP

850 Tenth Street, NW

Washington, DC 20001

(202) 662-5598

Michelle Peterson (D.C. Bar No. 438930)

Assistant Federal Public Defender

For the District of Columbia

625 Indiana Avenue, NW

Washington, DC 20004

(202) 208-7500 , ext. 125

Counsel for Keith Berman