

EXHIBIT B

The government proposes the below schedule for CIPA litigation in this case:

Date	Event
No later than July 10, 2023 (assuming timely interim clearance of defense counsel)	Government's initial production of classified discovery
August 14, 2023	Deadline for filing of government's first CIPA Section 4 Motion, if necessary
September 5, 2023	Deadline for all defense discovery requests
September 12, 2023	Deadline for any notice under CIPA Section 5
September 19, 2023, or seven days after defendant's initial CIPA Section 5 Motion, whichever is later	Deadline for government's initial Rule 16 expert disclosures and CIPA Section 10 notice
October 3, 2023, or 21 days after defendant's initial CIPA Section 5 Motion, whichever is later	Deadline for government to file initial CIPA Section 6(a) Motion Defense Rule 16 expert disclosures due
October 17, 2023, or fourteen days after government's initial CIPA Section 6(a) Motion, whichever is later	Deadline for defense to file response to government's CIPA Section 6(a) Motion Government's supplemental Rule 16 expert disclosures due
October 24, 2023, or seven days after defendant's response to government's initial CIPA Section 6(a) Motion, whichever is later	Deadline for government to file reply on its CIPA Section 6(a) Motion
October 31, 2023, or within seven days after government's reply on its CIPA Section 6(a) Motion, whichever is later	CIPA Section 6(a) Hearing

November 14, 2023, or fourteen days from filing of a final written Order on government's initial CIPA Section 6(a) Motion, whichever is later	Deadline for any government CIPA Section 6(c) Motion, if necessary
November 21, 2023, or seven days from filing of government's CIPA Section 6(c) Motion, whichever is later	Deadline for defendant's response to government's CIPA Section 6(c) Motion, if necessary
November 28, 2023, or seven days from filing of defendant's response to government's CIPA Section 6(c) Motion, whichever is later	Deadline for government's reply in support of its CIPA Section 6(c) Motion, if necessary
December 5, 2023, or seven days after the government's reply on any CIPA Section 6(c) Motion, whichever is later	Hearing to address any remaining CIPA issues, including CIPA Section 6(c), if necessary
December 11, 2023	Trial (jury selection begins)