

**UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF GEORGIA
AUGUSTA DIVISION**

UNITED STATES OF AMERICA

v.

Reality Leigh Winner

Defendant

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CR 1:17-34

GOVERNMENT’S MOTION TO MODIFY AMENDED SCHEDULING ORDER

The United States of America, by and through its undersigned counsel, hereby moves this Court to modify the Amended Scheduling Order entered by the Court on August 31, 2017 (Dkt. No. 66). The government respectfully requests that this Court issue an Amended Scheduling Order, which sets a fulsome briefing schedule in advance of a potential CIPA § 6(a) hearing, with the deadlines set forth below. The defense is still reviewing the government’s proposal.

As the government has indicated, CIPA litigation must proceed in sequence, section by section, because one section cannot be adequately addressed until matters under the preceding section have been resolved. *See* Dkt. No. 30; *id.* at 9-15 (describing Section 5 and Section 6 proceedings); *see also United States v. Kim*, No. 1:10-cr-225-CKK (D.D.C), Dkt. Nos. 184, 241. The proposed schedule will facilitate CIPA proceedings without delay of the trial date.

Later of November 1, 2017 or 30 days after clearances for Messrs. Chester and Whitley	Defense deadline for filing all pretrial motions and any notice pursuant to § 5 of CIPA
Three Weeks from defense deadline for filing pretrial motions and § 5 Notice	Deadline for government response to defense motions and any objections to the adequacy of defense CIPA § 5 notice

CERTIFICATE OF SERVICE

This is to certify that I have on this day served all the parties in this case in accordance with the notice of electronic filing (“NEF”) which was generated as a result of electronic filing in this Court.

This 1st day of September 2017.

JAMES D. DURHAM
ACTING UNITED STATES ATTORNEY

//s// Julie A. Edelstein

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