

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

UNITED STATES OF AMERICA

v.

CRIMINAL NO. 1:18-CR-00032-DLF

INTERNET RESEARCH AGENCY LLC., *et al.*,

Defendants.

**JOINT MOTION FOR A BRIEFING SCHEDULE**

Pursuant to the Court’s May 29, 2018 Order, Defendant Concord Management and Consulting, LLC (“Defendant” or “Concord”), by and through undersigned counsel, and the United States of America, by and through Special Counsel Robert S. Mueller, III, hereby jointly move for the entry of a briefing schedule for pretrial motions.

As discussed during the May 15, 2018 status hearing, Defendant currently anticipates filing several pretrial motions that are not dependent on discovery. The Court requested that the parties agree upon a schedule to stagger these motions. To that end, the parties propose the following briefing schedule:

<b>Anticipated Motion</b>	<b>Filing Date</b>	<b>Opposition Date</b>	<b>Reply Date</b>
Challenge to authority of Special Counsel	July 16, 2018	August 15, 2018	August 31, 2018
Motion to Dismiss Indictment (multiple grounds)	August 3, 2018	September 4, 2018	September 18, 2018
Motion for Hearing Regarding Selective Prosecution	August 31, 2018	September 21, 2018	October 5, 2018

<b>Anticipated Motion</b>	<b>Filing Date</b>	<b>Opposition Date</b>	<b>Reply Date</b>
Due Process Challenge to Grand Jury Instructions <sup>1</sup>	September 21, 2018	October 22, 2018	November 5, 2018

Further, the United States has not yet started producing discovery while the parties confer regarding the terms of a protective order. As such, Defendant anticipates there may be additional motions filed depending on the materials received in discovery, including but not limited to a motion for a bill of particulars, motion(s) to suppress, and motion(s) to compel.

Dated: June 1, 2018

Respectfully submitted,

CONCORD MANAGEMENT AND  
CONSULTING LLC

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Special Counsel

By Counsel

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<sup>1</sup> Defendant's motion regarding a due process violation with respect to instructions provided to the grand jury relates to Defendants' motion for *in camera* inspection of the grand jury instructions, which is currently pending (Dkt. No. 11). Defendants intend to file this motion regardless of the Court's ruling on the currently pending motion. Under this proposal, Defendants will file the motion on September 21, 2018. If the Court prefers, Defendant can wait until the Court rules on the currently pending motion before scheduling briefing on the motion raising due process concerns.

**CERTIFICATE OF SERVICE**

I hereby certify that on this 1st day of June 2018, the foregoing was electronically filed with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to all counsel of record:

/s/ \_\_\_\_\_  
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