Goldberg, Jeffrey

From: Sent: To:	Goldberg, Jeffrey Thursday, March 31, 2011 11:35 PM 'tseg@gtlaw.com'; 'slarson@girardikeese.com'; 'mbusino@crowell.com';
2	'godwint@gtlaw.com'; 'mweber@girardikeese.com'; 'mhayes@helpcounsel.com'; 'mkowsari@girardikeese.com'; 'jlevine@crowell.com'; 'handzlikj@gtlaw.com' Magaala Nieglar Millor, Dauglag M. (USACAC)
Cc:	Mrazek, Nicola; Miller, Douglas M. (USACAC)
Subject:	United States v. Noriega, et al., 10-CR-1031 (AHM)
Attachments:	2011-03-31 USA letter to defense re joint estimate form.pdf

Case 2:10-cr-01031-AHM Document 642-4 Filed 09/05/11 Page 2 of 7 Page ID #:17429



U. S. Department of Justice

United States Attorney Central District of California

1300 United States Courthouse 312 North Spring Street Los Angeles, CA 90012

Douglas M. Miller Assistant United States Attorney (213) 894-2216

March 31, 2011

TRANSMITTED VIA EMAIL

All Defense Counsel of Record

Re: <u>United States v. Enrique Faustino Aguilar Noriega, et al.</u> CR 10-1031(A)-AHM

Dear Counsel:

Please find attached the Joint Trial Witness Time Estimate Form, which according to the Court's standing order for criminal trials should be completed by the parties. As you will note, the government has listed its expected trial witnesses (see 3/31/11 Gov't Let.) and its estimates for the length of its direct examinations. Kindly fill-in your cross-examination estimates, as well as your defense witnesses.

Very truly yours,

ANDRÉ BIROTTE JR. United States Attorney

/s/ DOUGLAS M. MILLER Assistant United States Attorney

NICOLA J. MRAZEK JEFFREY A. GOLDBERG Senior Trial Attorneys Criminal Division, Fraud Section United States Department of Justice

Attachment

L					
	WITNESS NAME	PARTY CALLING WITNESS AND ESTIMATE	X-EXAMINER'S ESTIMATE	DESCRIPTION OF TESTIMONY	COMMENTS
	ABARCA, ERILA	COVERNMENT (:16)		CURRENT GLOBAL EMPLOYEE (GRUPD ACCOUNT)	
8	BASURTO, S.R. FERNANDO GONZALEZ	(0,1)		COOPERATING WITNESS	
ŝ	BASULETO, J.R. FERNANDO MAYA	(J) (J)		COOPERATING WITNESS	IN OWATODY
4	BATES, JANE ELLEN	(5,2)		CURRENT GLOBAL EMPLOYED	
22	BERMAN, SHARON	(027)		FERRARI OF BENERN HILLS	
9	BINDER, FARRELL	(Q'I)		FBI AGENT (CASE AGENT)	
2	BOUTARASY, KARYN	(20)		CURPENT LINE EMPLOYEE	
∞	BROWN, MINETTE	(, b)		CURPENT LUNC EMPLOYEE	
6	BUSTANI, EDWARDO	(0.2)		FORMEZ GLOBAL EMPLOYEE (GREUPO ACCOUNT)	
10	CEEDAN SAAVEDEA, ALMA PATELLIA	(G.1) - T		(071)	NEEDS SPANISH
Instructions: (1) List with off to closest	TOTAL ESTIMATES THIS PAGE: TOTAL ESTIMATES THIS PAGE: Instructions: (1) List witnesses (last name first); (2) For description, be extremely brief, e.g., "eyewitness to accident." Or "expert on standard of off to closest quarter of an hour. E.g., if you estimate 20 minutes, make it. 25. An estimate of one and one-half hours would be 1.5. Note servicial fortures in "Commente" of one and one-half hours would be 1.5.	ription, be extremely brief, <u>e.g.</u> , "ey timate 20 minutes, make it. 25. An e	ewitness to accident	TOTAL ESTIMATES THIS PAGE: Instructions: (1) List witnesses (last name first); (2) For description, be extremely brief, <u>e.g.</u> , "eyewitness to accident." Or "expert on standard of care." (3) Use estimates within fractions of an hour, rounded off to closest quarter of an hour. For would be 1.5. An estimate of one and one-half hours would be 1.5. An estimate of three-quarters of an hour would be .75; (4) Note seefal fequarter in "Comments" columnes.	ctions of an hour, rounded hour would be .75; (4)

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JUDGE A. HOWARD MATZ

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	WITNESS NAME	PARTY CALLING WITNESS AND ESTIMATE	X-EXAMINER'S ESTIMATE	DESCRIPTION OF TESTIMONY	COMMENTS
	CILIGIAANO, RAUPH GOVERNMENT (1.0)	GOVERNMENT (1.0)		FORMER UMC EMPLOYEE	
2	002762,568410	(31,15)		CURRENT LINC EMPLOYEE	
33	COSTLEY, DANE	(0'&)		FBT AGENT (SUMMARY WITNESS)	
4	DE GHEFTO, MICHAEL	(a·1)		Formez unc emproyee	
5	DELLANDO, CONCEPCION	(91.)		ANGERA AGUILARYS FRIENIN	NGEDS SPANISH INTERPERTEZ
9	DODSON) CHRIGTOPHER	(9')		FBT AGENT (INTERVIEWED STEVE LEE)	
7	ERICKSON, PAUL	(シレ)		CURRENT LUNC EMPLOYEE	
×	GAPZA, LAURA	(1,0)		(WERENT CLOBAL EMPLOYEE (GRUPO ACCOUNT)	
6	GODMAN, ROBIN			SOUTH SHORE VACIAT SALES	
10	HARVIN, ANDZEW	(9.)		ATTORNEY FOR GLOBAL (GRUPO ACCOUNT)	
	TOTAL ESTIMATES THIS PAGE:				

Instructions: (1) List witnesses (last name first); (2) For description, be extremely brief, <u>e.g.</u>, eyewuww werd one-half hours would be 1.3. *i* off to closest quarter of an hour. <u>E.g.</u>, if you estimate 20 minutes, make it .25. An estimate of one and one-half hours would be 1.3. *i* Note special factors in "Comments" column. <u>E.g.</u>, "Needs interpreter." (5) Entries may be in handwriting <u>if very neat and legible</u>.

Page <u>2</u> of ____.

JUDGE A. HOWARD MATZ

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	WITNESS NAME	PARTY CALLING WITNESS AND ESTIMATE	X-EXAMINER'S ESTIMATE	DESCRIPTION OF TESTIMONY	COMMENTS
	KILLEBREW, BRUCE	GOVERNMENT (:75)		South Strate VACIAT SALES	
5	KNOK, CONNIC	(9°)		FORMER UME EMPLOYEE	
ε	KWOK, MANG HUE	(0°)		CURRENT LMC EMPLOYEE	
4	LAMARCHE, JEAN-GUN	(d.o)		ENFIQUE AGULILAZIS	NEEDS FRENCH INTERPRETER
2	MOPENO, GENOVENA	(.6)		BADA HORIZON LUC (JACIAT)	
9	MORENO, JEMA	(.5)		CEORP MORENOVS DANGHTER	
2	MORENO, ROBERT	(:2)		INDUCATIONE AGENT (FERZAZI)	
∞	PALMER, JAIME	(212)		CURRENT BUNFFVIEW EMPLOYEE (GRUPO ACCOUNT)	
6	SEPOCKLI, RICHARD	(0.0)		FORMER LUNC EMPLOYEE	
10	SPILLANE, PHILIP	(51.)		CURRENT LMC EMPLOYEE	
	TOTAL ESTIMATES THIS PAGE:				

Instructions: (1) List witnesses (last name first); (2) For description, be extremely Drue, $\frac{e.g.}{e.g.}$, $\frac{1}{25}$. An estimate of one and one-halt nours www. $\frac{1}{26}$, if you estimate 20 minutes, make it .25. An estimate of one and one-halt nours www. $\frac{1}{26}$, off to closest quarter of an hour. $\frac{E.g.}{E.g.}$, if you estimate 20 minutes, make it .25. An estimate of one and one-halt nours www. $\frac{1}{2.6}$, if you estimate 20 minutes, make it .25. An estimate of one and one-halt nours www. $\frac{1}{2.6}$, if you estimate 20 minutes, make it .25. An estimate of one and one-halt nours www. $\frac{1}{2.6}$, $\frac{1}{2.6}$,

Page D of

JUDGE A. HOWARD MATZ

Case 2:10-gr-01031-AHM Document 642-4 Filed 09/05/11 Page 5 of 7 Page ID #:17432

			JOINT TRIAL			L
ы Ш	CASE: U.S. v. Noriega, et	al.			TRIAL DATE: AP	April 5, 2011
	WITNESS NAME	PARTY CALLING WITNESS AND ESTIMATE	ING TIMATE	X-EXAMINER'S ESTIMATE	DESCRIPTION OF TESTIMONY C	COMMENTS
-	VAPCO, SUZANNE	GOVERNMENT (05)	(C))		NEOTOR MORENOUS NEIGHEOR (GAN DIEGO)	
2	WILLETT, BRYAN		(0.1)		FOI AGENT (INTERVIEWED STEVE LEE)	
ę	ZAVALETA, JOEE		(2,0)		FORMER LUNG EMPLOYEE	
4						
с,						
9						
2						
∞						
6						
10						
	TOTAL ESTIMATES THIS PAGE:					

<u>Instructions:</u> (1) List witnesses (last name first); (2) For description, be extremely brief, <u>e.g.</u>, "eyewitness to accident." Or "expert on standard of off to closest quarter of an hour. <u>E.g.</u>, if you estimate 20 minutes, make it .25. An estimate of one and one-half hours would be 1.5. , Note special factors in "Comments" column. <u>E.g.</u>, "Needs interpreter." (5) Entries may be in handwriting <u>if very neat and legible</u>.

i

Goldberg, Jeffrey

From:	Levine, Janet [JLevine@crowell.com]
Sent:	Thursday, March 31, 2011 11:37 PM
To:	Goldberg, Jeffrey; tseg@gtlaw.com; slarson@girardikeese.com; Busino, Martinique; godwint@gtlaw.com; mweber@girardikeese.com; mhayes@helpcounsel.com; mkowsari@girardikeese.com; handzlikj@gtlaw.com
Cc:	Mrazek, Nicola; Miller, Douglas M. (USACAC); Levine, Janet
Subject:	RE: United States v. Noriega, et al., 10-CR-1031 (AHM)

I cannot complete this form without knowing the exhibits and the order of witnesses.

From: Goldberg, Jeffrey [mailto:Jeffrey.Goldberg2@usdoj.gov]
Sent: Thursday, March 31, 2011 8:35 PM
To: tseg@gtlaw.com; slarson@girardikeese.com; Busino, Martinique; godwint@gtlaw.com; mweber@girardikeese.com; mhayes@helpcounsel.com; mkowsari@girardikeese.com; Levine, Janet; handzlikj@gtlaw.com
Cc: Mrazek, Nicola; Miller, Douglas M. (USACAC)
Subject: United States v. Noriega, et al., 10-CR-1031 (AHM)

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