Goldberg, Jeffrey

From:

Goldberg, Jeffrey

Sent:

Monday, April 04, 2011 6:04 PM

To:

'tseg@gtlaw.com'; 'slarson@girardikeese.com'; 'mbusino@crowell.com';

'godwint@gtlaw.com'; 'mweber@girardikeese.com'; 'mhayes@helpcounsel.com'; 'mkowsari@girardikeese.com'; 'jlevine@crowell.com'; 'handzlikj@gtlaw.com' Mrazek, Nicola; Miller, Douglas M. (USACAC)

Cc:

Subject: Attachments: United States v. Noriega, et al., 10-CR-1031 (AHM)

2011-04-04 USA letter to defense re joint estimate form.pdf



U. S. Department of Justice

United States Attorney Central District of California

Douglas M. Miller Assistant United States Attorney (213) 894-2216 1300 United States Courthouse 312 North Spring Street Los Angeles, CA 90012

April 4, 2011

TRANSMITTED VIA EMAIL (3:00 p.m.)

All Defense Counsel of Record

Re: United States v. Enrique Faustino Aguilar Noriega, et al.

CR 10-1031(A)-AHM

Dear Counsel:

On March 31, 2011, the government sent you a Joint Trial Witness Time Estimate Form, which according to the Court's standing order for criminal trials should be completed by the parties. Enclosed is a revised version, which reflects the addition of Special Agent Tandra Waldrop and also includes total estimates per page as required by the form. Kindly fill-in your cross-examination estimates and your defense witnesses, and return the document to the government.

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

Page ____ of.

Case 2:10-dr-01031-AHM

2011

5

April

TRIAL DATE:

Document 642-5

JUDGE A. HOWARD MATZ

al et v. Noriega,

CASE: U.S.

JOINT TRIAL WITNESS TIME ESTIMATE FORM

NAPO OPENIOS IN TASS SAFAS IN CURPODY COMMENTS ANDELA AGUILARYS NEIGHBOR (MIGNICO) GRUPO ACCOUNT GRUPO ACCOUNT CURRENT GLOBAL EMPLOYED FERRARI OF BENERA HILLS CURRENT GLOBAL CERTICAL (GIRUPO ACCOUNT) FORMER GLOBAL TAMPLOKE CURPERT UNC EMPLOYEE DESCRIPTION OF TESTIMONY CURPANT INC EMPLOYER COOPERATION WILLIAM COOPAGATING WITNASS FBI AGENT (CASE AGENT) X-EXAMINER'S ESTIMATE (5,7) GOVARAMONT (1/2) (C)(S) (5.0) (5.0) 12.46 (000) (2) (E) (2.0)(P)(3) PARTY CALLING
WITNESS AND ESTIMATE (1.16) CAPACTO GONDARAS SPEN, JESH DUBY BUDTANI, COWASDO CACAN SEASOR FRANTO MAYA BOUT ARASY, KARYN BEZMAN, SHARON ALMA PATEICIA BINDA, FARRELL BROWN, MINETTE TOTAL ESTIMATES THIS PAGE: ABARCA, ORICA WITNESS NAME BASWETD, SR. BASURTO, JR. 10

(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. <u>E.g.</u>, if you estimate 20 minutes, make it .25. 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 special factors in "Comments" column. Eg., "Needs interpreter." (5) Entries may be in handwriting if very neat and legible.

July 21, 1999

Page ID #:17437

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Filed 09/05/11

JUDGE A. HOWARD MATZ

JOINT TRIAL WITNESS TIME ESTIMATE FORM

				of	JUDGE A. HOWARD MATZ	/ARD MATZ		Ca
CAS.	ii Pl	CASE: U.S. v. Noriega, et	Jal.	JOINT TRIAL		WITNESS TIME ESTIMATE FORM TRIAL DATE:	April 5, 2011	se 2:10-
		WITNESS NAME	PARTY CALLING WITNESS AND ESTIMATE	ALLING D ESTIMATE	X-EXAMINER'S ESTIMATE	DESCRIPTION OF TESTIMONY	COMMENTS	dr-010
		CIRIGLIANO, RALPH GOVERNMENT (1.0)	GOVERNME	(0:0)		FORMER UMC EMPLOYEE) 31-AF
	2	CORTEZ, 5ERG10		(37.1)		CURRENT LING EMPLOYEE		∦M Do
	က	COSTLEY, DANE		(9.6)		FBI AGENT (SUMMARY WITNESS)		cumer
	4	DE GHETTO, MICHAREL		(0.1)		FORMEZ UMC EMPLOYEE		1t 642-
	5	DELGADO, CONCEPCION		(31.)		ANGELA AGUILAZOS FRIEND	NGGDS SPANISH INTERPRETERS	5 File
	9	DODSON, CHRISTOPHER		(9')		FBI FRENT (INTERVIEWED STEVE LEE)		d 09/0
,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	7	EDICKSON, PAUL		(513)		CURRENT UMC EMPLOYEE		5/11
	∞	GARZA, LAURA		(1.0)		CURREGINT GLOBAL EMPLOYEE (GRUPO ACCOUNT)		Page 4
	6	GOODMAN, ROBIN		(22)		SOUTH SHORE VACITY SALES		of 7
A	10	HARVIN, ANDREW		(%)		AFTORNEY FOR GLOBAL (GRUPO ACCOUNT)		Page I
		TOTAL ESTIMATES THIS PAGE:		11.0				D #
In List with off to closest Note special	t witr loses	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 the 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 if yery neaf and legible.	iption, be extreme imate 20 minutes, g., "Needs interpr	ly brief, <u>e.g.,</u> "eye make it .25. An e eter." (5) Entries	witness to accident stimate of one and may be in handw	f care." An estin	papı	17438

JUDGE A. HOWARD MATZ

JOINT TRIAL WITNESS TIME ESTIMATE FORM

			Л	JUDGE A. HOWARD MATZ	/ARD MATZ		Ca
CAS	円 D l	CASE: U.S. v. Noriega, et	JOINT TRIAL	_	WITNESS TIME ESTIMATE FORM TRIAL DATE:	April 5, 2011	se 2:10-
		WITNESS NAME	PARTY CALLING WITNESS AND ESTIMATE	X-EXAMINER'S ESTIMATE	DESCRIPTION OF TESTIMONY	COMMENTS	ç r-01(
		KILLEBREW, BRUCE	GOVERNMENT (35)		SOUTH SHORE YACHT SALES)31-AH
	2	KNOK, CONNIC	(91)		FORMER UME BANFLOYEE		M Do
	3	KNOK, MANG HUE	(a·1)		CURRENT LMC EMPLOYEE		cume
	4	LAMARCHE, SEAN-GLV	(4.0)		ENFIGUE AGIVILARIS FORMER FAMPLOYEE	NAEDS FRENCH INTERPRETER	nt 642-
	5	MOPENO, GENOVEVA	(91)		BADA HORIZON (LC (VACIAT)		5 File
	9	MORENO, JEMA	(6,)		CESAR MORENO'S DANGHTER		d 09/0
	L	MORENOIROBEET	(9)		INSURANCE ACENT (FERZAZI)		5/11
	∞	PALMER, JAIME	(31:)		CLURGEAT BLUFF VIEW EMPLOYEE (GRUPO ACCOUNT)		Page 5
	6	SEPOCKLI, RICHARD	(0.0)		FORMEZ LIMIC EMPLOYEE		of 7
	10	SPILLANE, PIFILIP	(313)		CURRENT UMC EMPLOYEE		Page I
		TOTAL ESTIMATES THIS PAGE:	92.01				D #
Instructions (1) List with off to closest Note special	ction of with closes pecial	Instructions: (1) List witnesses (last name first); (2) For description, be extremely brief, <u>e.g.</u> , "eyewitness to accident." Or "expert on standard o 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>	iption, be extremely brief, <u>e.g.,</u> "ey imate 20 minutes, make it .25. An <u>g.,</u> "Needs interpreter." (5) Entrie	ewitness to accidentestimate of one and	f care." An estir	(3) Use estimates within fractions of an hour, rounded nate of three-quarters of an hour would be .75; (4)	:17439

Page H of ____.

JUDGE A. HOWARD MATZ

JOINT TRIAL WITNESS TIME ESTIMATE FORM

2011

5

April

TRIAL DATE:

CASE: U.S. v. Noriega, et al.

COMMENTS NOSTOR MOZEND'S NEIGHBOR (SAN DIEGO) FBI AGENT (PUBLICATION WITCHESS) FOT AGENT (INTORVIONA) CITUR (AB) DESCRIPTION OF TESTIMONY FORMER LIME COMPLOYCE X-EXAMINER'S ESTIMATE GOVAZNATA (20) (O:1) (j.5) (2.0)PARTY CALLING WITNESS AND ESTIMATE VARCO, SURGENIA MALDER, LANDEA WILLETT, BENAN YMARKA, COR WITNESS NAME 10 9 00 6

Filed 09/05/11

Page 6 of 7

(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. <u>E.g.</u>, if you estimate 20 minutes, make it .25. 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 special factors in "Comments" column. <u>E.g.</u>, "Needs interpreter." (5) Entries may be in handwriting if very neat and legible.

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TOTAL ESTIMATES THIS PAGE:

Page ID #:17440

Goldberg, Jeffrey

From:

Levine, Janet [JLevine@crowell.com]

Sent:

Monday, April 04, 2011 6:46 PM

To:

Stephen Larson; Goldberg, Jeffrey; tseg@gtlaw.com; Busino, Martinique;

godwint@gtlaw.com; Molly Weber; mhayes@helpcounsel.com; Michael Kowsari;

handzlikj@gtlaw.com

Cc:

Mrazek, Nicola; Miller, Douglas M. (USACAC)

Subject:

RE: United States v. Noriega, et al., 10-CR-1031 (AHM)

Lagree with Stephen.

From: Stephen Larson [mailto:slarson@girardikeese.com]

Sent: Monday, April 04, 2011 3:42 PM

To: 'Goldberg, Jeffrey'; tseg@gtlaw.com; Busino, Martinique; godwint@gtlaw.com; Molly Weber;

mhaves@helpcounsel.com; Michael Kowsari; Levine, Janet; handzliki@qtlaw.com

Cc: Mrazek, Nicola; Miller, Douglas M. (USACAC)

Subject: RE: United States v. Noriega, et al., 10-CR-1031 (AHM)

I will take this up with the Court in the morning; my concern is that disclosing in advance my cross examination estimates will reveal certain defense case strategy that I am not prepared to disclose at this time.

Best, Stephen

From: Goldberg, Jeffrey [mailto:Jeffrey.Goldberg2@usdoj.gov]

Sent: Monday, April 04, 2011 3:04 PM

To: tseg@gtlaw.com; Stephen Larson; mbusino@crowell.com; godwint@gtlaw.com; Molly Weber;

mhaves@helpcounsel.com; Michael Kowsari; jlevine@crowell.com; handzlikj@gtlaw.com

Cc: Mrazek, Nicola; Miller, Douglas M. (USACAC)

Subject: United States v. Noriega, et al., 10-CR-1031 (AHM)