

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
CASE NO. 22-20290-CR-BLOOM/OTAZO-REYES**

UNITED STATES OF AMERICA,

v.

ERIC DEAN SHEPPARD,

Defendant.

**GOVERNMENT'S SECOND RESPONSE TO
THE STANDING DISCOVERY ORDER**

The United States hereby files this second response to the Standing Discovery Order. This response also complies with Local Rule 88.10 and Federal Rule of Criminal Procedure 16.

- A. Books, papers, documents, data, photographs, tangible objects, buildings or places, within the government's possession, custody or control, which are material to the preparation of the defendant's defense, or which the government intends to use as evidence at trial to prove its case in chief, or which were obtained from or belong to the defendant, may be inspected at a mutually convenient time at: the Office of the United States Attorney, 99 Northeast 4th Street, Miami, Florida, Suite 4000. Please call the undersigned to set up a date and time that is convenient to both parties.

The attachments to this discovery response are not necessarily copies of all the books, papers, documents, data, etc., that the government may intend to introduce at trial.

- B. **DEMAND FOR RECIPROCAL DISCOVERY:** Pursuant to the Standing Discovery Order, the United States requests the disclosure and production of materials listed in Section (b) of Local Rule 88.10. This request is also made pursuant to Rule 16(b) of the Federal Rules of Criminal Procedure.

The government is aware of its continuing duty to disclose such newly discovered additional information required by the Standing Discovery Order, Rule 16(c) of the Federal Rules of Criminal Procedure, Brady, Giglio, Napue, and the obligation to assure a fair trial.

The Government is producing via email a zip file containing documents bates numbered as SHEPP_010357 – SHEPP_010546. Please contact the undersigned Assistant United States Attorney if any pages are missing.

Respectfully submitted,

JUAN ANTONIO GONZALEZ
UNITED STATES ATTORNEY

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on August 19, 2022, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF, which will send Notices of Electronic Filing to all counsel of record.

/s Marty Fulgueira Elfenbein
MARTY FULGUEIRA ELFENBEIN
Assistant United States Attorney