UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v. Docket No. 24-cr-10233-MJJ

KATHERINE REYNOLDS,
Defendant

MOTION FOR SEQUESTRATION OF WITNESSES

Now comes the Defendant in the above-numbered Indictments and moves this Court to order that all witnesses be sequestered from the courtroom during the trial of this case and further that all witnesses be instructed that they may not discuss the subject matter of their testimony or the questions asked by either counsel with any other prospective witness until the conclusion of the trial proceeds.

The defendant moves that this Court order that each witness:

1. Shall not discuss this case, including but not limited to his or her prospective testimony with any other witness;
2. Shall be excluded from the courtroom when other witnesses are testifying; and
3. Shall not, after testifying, tell any prospective witness what he or she was asked or answered.

Counsel for the government and defendant shall inform their prospective witnesses of this Order.

This Order shall not operate to prevent counsel from conferring with a witness prior to his or her testimony. However, unless protected by attorney-client privilege or some other applicable privilege, such communication may be explored on direct and/or cross-examination of the witness.

Respectfully submitted,
Katherine Reynolds
By her attorney,

/s/ Joan M. Fund
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CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

/s/ Joan M. Fund
Joan M. Fund, Esquire

Date: January 26, 2026