

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

|                                 |   |                                 |
|---------------------------------|---|---------------------------------|
| <b>UNITED STATES OF AMERICA</b> | : | <b>CRIMINAL NO. 81-306(PLF)</b> |
|                                 | : |                                 |
| <b>v.</b>                       | : |                                 |
|                                 | : |                                 |
| <b>JOHN W. HINCKLEY, JR.</b>    | : |                                 |

**JOINT SUBMISSION REGARDING  
FILING OF PLEADINGS AND EXPERT REPORTS**

The United States of America, by and through its attorney, the United States Attorney for the District of Columbia, respectfully submits the following.

Counsel for Mr. Hinckley, the government, and the Hospital have conferred regarding dates for submission of pleadings and reports from the government's experts. The parties have agreed about dates for submission of pleadings, if any, in response to the Hospital's § 501(e) letter, which the Court already has ordered to be filed no later than May 28, 2008. The parties propose that the government will file any pleading on June 4, 2008, and Mr. Hinckley will file any reply on June 11, 2008.

The parties have not agreed upon the date when the reports from the government's experts will be due. Counsel for Mr. Hinckley requests that the reports of the government's experts, along with their interview recordings and notes, be due on June 30, 2008. Counsel submits that one month is sufficient time for the government's experts to prepare their reports in response to the Hospital's 501(e) letter. Counsel further submits that three weeks is needed to prepare to respond to the reports at the hearing scheduled for July 21.

Counsel for the government requests that the reports, recordings, and notes of the government's experts be due on July 7, 2008. The doctors have asked that their reports be due two weeks before the hearing, just as last year. The experts are concerned that, given their schedules and the work needed, an earlier deadline may impair the thoroughness of their reports.

Counsel for the Hospital takes no position on whether the reports should be due on June 30 or July 7.

The Hospital's Risk Assessment and the reports of the government's experts will be provided to the Court's chambers after the reports of the government's experts are received, as has been the practice in the past.

Counsel for Mr. Hinckley has agreed to make the notes of Dr. Lee and Mr. Beffa available to the Hospital and government counsel at the same time as those of the government's experts are available.

WHEREFORE, the parties request that the Court decide the date upon which the expert's reports will be due and sign the proposed Order regarding the dates on which the pleadings and expert reports will be due.

Respectfully submitted,

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