

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

UNITED STATES OF AMERICA)	CRIMINAL NO. 10-225 (CKK)
)	
v.)	
)	
STEPHEN JIN-WOO KIM,)	
also known as Stephen Jin Kim,)	
also known as Stephen Kim,)	
also known as Leo Grace,)	
)	
Defendant.)	

JOINT NOTICE

Defendant Stephen Kim and the United States of America (collectively, the “parties”), through their undersigned counsel, submit this Joint Notice pursuant to the Court’s November 19, 2013 Order. In addition to the scheduling issues raised in this Court’s December 16, 2013 Orders, the parties advise the Court of the following issues to be raised at the January 7, 2014, status hearing:

I. Joint Notice of Protocol for Phone Number Filter Process

As the Court is aware, a filter team has been established to search commercial toll records of certain government employees against data provided to the filter team by the defense. The parties have conferred regarding the protocol for “hits” generated through this process. The parties have agreed that for any such “hits,” the filter team shall: (1) inform the United States of the USG employee number; and (2) inform the defense of the USG employee number, the phone number that produced the hit, and the date, time, and duration of the call. The parties will meet and confer regarding any requests for further information about the USG employee or employees at issue. The United States also believes it should receive disclosure of whether the “hit”

occurred before or after the “cut-off” time, and will raise that issue at the January 7, 2014 status hearing.

II. Defendant’s Notice of Outstanding Issues

At the last status hearing the defense requested the early production of Jencks materials to allow those materials to be included in the CIPA process. The government asked for an opportunity to review that request and respond to the Court. The defense will renew its request that the Court set a date for the production of Jencks materials.

Respectfully submitted,

RONALD C. MACHEN JR.
UNITED STATES ATTORNEY

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Certificate of Service

I hereby certify that on January 6, 2014, I caused a true and correct copy of the foregoing Joint Notice to be served via the Court's ECF filing system to all counsel of record in this matter.

_____/s/_____
G. Michael Harvey