

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

UNITED STATES OF AMERICA	§	
	§	No. 3:12-CR-413-L
v.	§	No. 3:13-CR-030-L
	§	
BARRETT LANCASTER BROWN	§	

MOTION FOR NOTICE PURSUANT TO FED. R. CRIM. P. 12.2

1. The United States, acting by and through the undersigned United States Attorney for the Northern District of Texas, requests this Court for an Order that Barrett Brown be ordered to comply with Fed. R. Crim. P. 12.2.
2. Specifically, the government requests that Brown provide written notice pursuant to the Fed. R. Crim. P. 12.2(b), of his intent to rely upon on any evidence or expert testimony relating to a mental disease or defect or any other mental condition of Brown, bearing on the issue of Brown's guilt. The government also requests the disclosure of any reports of examination pursuant to Fed. R. Crim. P. 12.2(c). The government requests that the written notice and the disclosure of any reports be accomplished at least 30 days prior to the trial date, so that the government could determine whether it needs to consult with or retain the services of an expert witness.

3. Further, the government requests that this court exclude any evidence pursuant to Fed. R. Crim. P. 12.2, if the defendant fails to provide timely notice or produce the reports.

Respectfully submitted,

SARAH R. SALDAÑA
UNITED STATES ATTORNEY

S/ Candina S. Heath
CANDINA S. HEATH
Assistant United States Attorney
State of Texas Bar No. 09347450



CERTIFICATE OF CONFERENCE

I hereby certify that on August 8, 2013, I advised Barrett Brown's lead counsel Ahmed Ghappour of my intent to file this motion, and requested his position. Mr. Ghappour was unable to respond by the time I filed the motion.

S/ Candina S. Heath
CANDINA S. HEATH
Assistant United States Attorney

CERTIFICATE OF SERVICE

I hereby certify that on August 8, 2013, I electronically filed the foregoing document with the clerk for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the court. The electronic case filing system sent a "Notice of Electronic Filing" to Brown's attorney of record Doug Morris who consented in writing to accept this Notice as service of this document by electronic means.

S/ Candina S. Heath
CANDINA S. HEATH
Assistant United States Attorney