IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF ALABAMA NORTHERN DIVISION

UNITED STATES OF AMERICA)	
)	
v.)	CRIMINAL NO. 2:10cr-186-MHT
)	
MILTON E. MCGREGOR, ET AL.)	

UNITED STATES' SUPPLEMENTAL PROPOSED JURY INSTRUCTIONS

The United States of America, through undersigned counsel, hereby respectfully requests that the following Supplemental Proposed Jury Instructions be given to the jury in the above-styled case.

Respectfully submitted this the 30th day of July, 2011.

UNITED STATES' SUPPLEMENTAL PROPOSED JURY INSTRUCTION NO. 1 <u>Joint Transcripts</u>

Transcripts admitted into evidence are the parties' best efforts to accurately transcribe the corresponding portions of admitted audio recordings.

UNITED STATES' SUPPLEMENTAL PROPOSED JURY INSTRUCTION NO. 2

<u>Preparation of Witnesses</u>

It is perfectly proper for prosecutors and defense attorneys alike to prepare their witnesses in preparation for trial. In fact, it would be irresponsible for a party to put on a witness without first preparing the witness.

AUTHORITY

<u>Banks v. Thaler</u>, 583 F.3d 295, 322-23 (5th Cir. 2009); <u>United States v. Rivera-Hernandez</u>, 497 F.3d 71, 80 (1st Cir. 2007) (quoting <u>United States v. Mooney</u>, 315 F.3d 54, 60 (1st Cir. 2002); <u>United States v. Torres</u>, 809 F.2d 429, 434 (7th Cir. 1987).

CERTIFICATE OF SERVICE

I hereby certify that on July 30, 2011, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all attorneys of record.

/s/ Barak Cohen
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