

UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT

UNITED STATES OF AMERICA :
 : No. 3:19 Cr. 251 (MPS)
- v. - :
 :
OLEG KOSHKIN, :
 :
 : December 30, 2020
Defendant. :

JOINT STATUS REPORT

The government, following consultation with defense counsel, respectfully submits this Joint Status Report and Witness and Exhibit List in compliance with the Court's order of December 15, 2020.

The parties agree that portions of the Russian translations contained in GX2, GX4, DX1 DX2 are in dispute. The parties further agree that the proper course is for each party to produce live testimony from qualified witnesses on the issue of the disputed translations. *See.e.g., United States v. Chalarca*, 95 F.3d 239, 246 (2d Cir. 1996). Thereafter, the Court can resolve to its satisfaction the disputes in the normal course of deciding factual issues in contested matters such as the pending motion to suppress.

Government Witnesses and Exhibits

FBI Language Specialist Zurab Charkviani
FBI Special Agent Michael Morrison
FBI Language Specialist Margarita Alperovich

GX1: Advice of Rights form (English)
GX2: Advice of Rights form (Russian)
GX3: Audio recording of post-arrest interview
GX4: Translation by FBI Language Specialist Margarita Alperovich

Defense Witnesses and Exhibits

Oleg Koshkin
Alexander Tetradze, Expert Russian Translator/Interpreter

DX1: Translation by Dmitriy S. Tucker
DX2: English Translation of GX2

Respectfully submitted,

JOHN H. DURHAM
UNITED STATES ATTORNEY



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CERTIFICATE OF SERVICE

I hereby certify that on December 30, 2020, a copy of the foregoing motion was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by email to all parties by operation of the court's electronic filing system or by mail to anyone unable to accept electronic filing, as indicated on the Notice of Electronic Filing. Parties may access this filing through the court's CM/ECF system.


EDWARD CHANG