

5-DAY SPRINT

Shannon Research Product

EDPA Litigation Intelligence Deployment Guide

Build a tendency + predictability engine for
EDPA criminal and bankruptcy cases

Case: US v. Redmond, EDPA 24-376 (27 counts)

Bankruptcy: Judge Mayer

Date: January 2026

Version: 2.0 Final

PRIVILEGED & CONFIDENTIAL — ATTORNEY WORK PRODUCT

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EXECUTIVE SUMMARY

Mission & Deliverables

Mission

■ Primary Objective

Build a **tendency + predictability engine** for EDPA criminal and bankruptcy cases in **5 working days**.

Hard Deliverables

#	Deliverable	Format	Day Due
1	Master dataset	XLSX (14 tabs)	Day 4
2	Final report	25-60 pages	Day 5
3	Citable paragraphs	Library (50-150)	Day 3
4	ABCD prediction trees	By motion type	Day 4
5	Docket + attachments	100% indexed	Day 4

5-Day Sprint Schedule

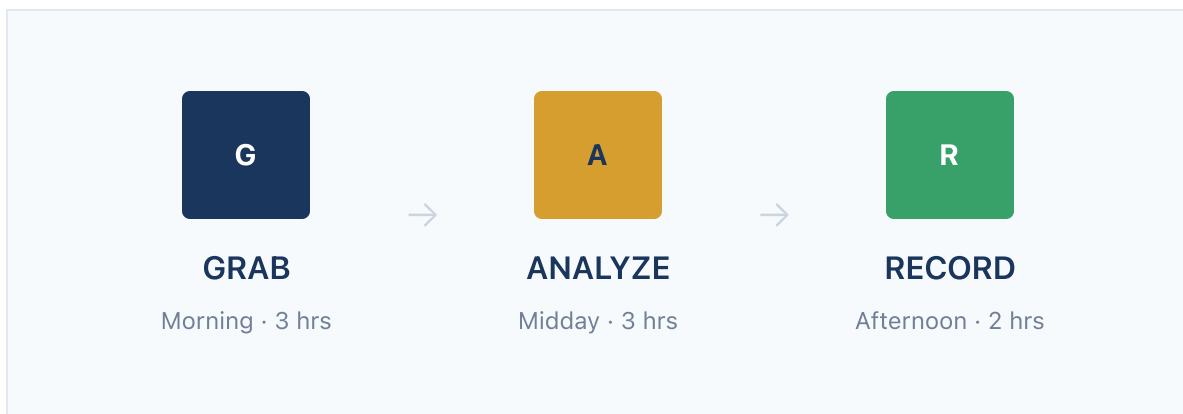




Day	Focus	Output
DAY 1	Schemel + Mayer	Case indexes + 20 exemplars + 15 citable quotes
DAY 2	Crawley + Dalke + DOJ EDPA	Profiles + patterns + 15 citable quotes
DAY 3	Nationwide + Motion Library	Trends + doctrine library + 20 citable quotes
DAY 4	Dockets + ABCD trees	100% dockets indexed + prediction engine
DAY 5	Final report + QC	25-60 page report + verified workbook

■ Total Time
38-40 hours over 5 days (approximately 8 hours per day)

Daily Workflow Pattern



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STEP ONE

Setup

- Day 1 Morning
- 1 hour

1.1 Create Westlaw Folder Hierarchy

In Westlaw Edge, create this folder structure:

```
EDPA_24-376_Research/
├── 01_Judges/
│   ├── Schemel_Cases/
│   └── Mayer_Cases/
├── 02_Prosecutors/
│   ├── Dalke_Cases/
│   └── Crawley_AOPCs/
├── 03 DOJ_Patterns/
│   ├── EDPA_Oppositions/
│   └── Nationwide_Sample/
├── 04_Motion_Library/
│   ├── Brady_Giglio/
│   ├── Franks/
│   ├── Selective_Vindictive/
│   ├── Daubert/
│   └── MTD/
└── 05_Our_Dockets/
    ├── Criminal_24-376/
    └── Bankruptcy/
```

Screenshot: Westlaw Folder Structure

Insert screenshot of your Westlaw folder hierarchy here

1.2 Configure CoCounsel Database

1. Open CoCounsel → "Search a Database" skill
2. Create new database: `EDPA_24376_Research_[YYYYMMDD]`
3. Set up tags using motion codes M01-M12 (see Motion Types below)

1.3 Set Up Workbook

1. Open `EDPA_Intel_Workbook_V2.xlsx`
2. Verify all 14 tabs present
3. Enable auto-filter on all column headers
4. Set freeze panes on row 1

1.4 Confirm Subscriptions

Westlaw Edge with Litigation Analytics

CoCounsel 2.0 access

PACER account active

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STEP TWO

Judge Schemel Deep Dive

- Day 1
- 4 hours
- 60 cases + 15 exemplars

2.1 Pull Judge Analytics Dashboard

1. Navigate: **Westlaw** → **Litigation Analytics** → **Judges**
2. Search: **Schemel** + Court = EDPA + Date = last 10 years
3. Export/screenshot:
 - Motion grant rates by type
 - Average time to rule
 - Case-type distribution
4. Save to: **01_Judges/Schemel_Cases/Analytics_Screenshot.png**

Screenshot: Judge Schemel Analytics Dashboard

Insert Westlaw Litigation Analytics screenshot here

2.2 Build Case Index (Target: 60 cases)

1. Navigate: **Westlaw** → **Dockets** → **Advanced Search**
2. Filters:
 - Court = EDPA
 - Judge = Schemel
 - Date = last 10 years
 - Nature = Criminal

3. Export case list to Tab [02_Schemel_CaseIndex](#)

4. Fill all columns: Case#, Caption, Filed, Closed, Nature, Judge, Key Motions, Outcome

2.3 Extract 15 Exemplars

For each relevant case with key motions:

1. Download: Motion + Opposition + Reply + Order

2. Save to folder: [01_Judges/Schemel_Cases/{case_number}/](#)

3. Use naming: [YYYY-MM-DD_Doc#_DocType_Party_ShortTitle.pdf](#)

4. Log in Tab [03_Schemel_Exemplars](#)

2.4 Harvest 10 Citable Paragraphs

Use CoCounsel with this prompt:

Extract 1-3 paragraphs verbatim that:

- A judge could adopt into an order
- Support our motion position
- Criticize DOJ conduct or reasoning

Include exact page/paragraph pinpoint citation.

Log in Tab [11_Most_Citable_Paragraphs](#)

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STEP THREE

Judge Mayer Analysis

- Day 1
- 3 hours
- 30 cases + 10 exemplars

3.1 Pull Bankruptcy Case List

1. Navigate: **Westlaw → Dockets → Advanced Search**
2. Filters:
 - Court = EDPA Bankruptcy
 - Judge = Mayer
 - Date = last 10 years
3. If Litigation Analytics unavailable, use docket-driven method

3.2 Build Case Index (Target: 30 cases)

1. Export to Tab **04_Mayer_CaseIndex**
2. Focus on: adversary proceedings, sanctions, SBA/UST matters

3.3 Extract 10 Exemplars

1. Download motion packets for key rulings
2. Save to: **01_Judges/Mayer_Cases/{case_number}/**
3. Log in Tab **05_Mayer_Exemplars**

3.4 Harvest 5 Citable Paragraphs

Same CoCounsel prompt as Step 2.4. Log in Tab **11_Most_Citable_Paragraphs**

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STEP FOUR

Agent Crawley Profile

- Day 2
- 3 hours
- Franks vulnerabilities

4.1 Search for All Crawley Affidavits

1. Navigate: **Westlaw → Search within documents**
2. Query: "Crawley" AND "Affidavit" AND "probable cause"
3. Filter: EDPA, last 10 years

4.2 Index AOPC Patterns

For each affidavit found:

1. Note: Sources cited, methodology, language patterns
2. Log in Tab **09_Crawley_Profile**
3. Flag any: omissions, cherry-picking, selection bias

4.3 Flag Franks Vulnerabilities

■ Look For

- Context omissions
- Timing manipulations
- Alternative explanation ignored
- Regulator findings mischaracterized

4.4 Extract 10 Citable Paragraphs

CoCounsel prompt:

Identify any language discussing:

- Agent methodology criticism
- Omissions in affidavits
- Selection bias in evidence presentation

Quote verbatim with pinpoints.

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STEP FIVE

AUSA Dalke Profile

- Day 2
- 2 hours
- 15 cases + patterns

5.1 Pull Dalke Case History

1. Search dockets by attorney name: `Dalke`
2. Export cases to Tab `08_Dalke_Profile`
3. Target: 15 cases minimum

5.2 Map Argument Templates

For each case:

1. Pull motions/oppositions Dalke authored
2. Note: Opening arguments, favorite citations, language patterns
3. Identify: What he concedes, what he fights hardest

5.3 Extract 5 Citable Paragraphs

Focus on: Dalke losses, judge criticisms, successful defense counters

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STEP SIX

DOJ EDPA House Style

- Day 2
- 3 hours
- 30 opposition samples

6.1 Sample 30 Oppositions by Motion Type

Motion Type	Target Count
Continuance opposition	8
Brady/Giglio opposition	8
Suppression/Franks opposition	8
Severance opposition	6

6.2 Document Boilerplate Patterns

Create template library:

1. Standard opening paragraphs
2. Favorite authorities cited
3. Typical concession language
4. Fallback arguments

6.3 Build Counter-Argument Matrix

Log in Tab [06_EDPA DOJ CaseIndex](#)

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STEP SEVEN

DOJ Nationwide Trends

- Day 3
- 4 hours
- 40 matters sampled

7.1 Sample 40 Matters Across Districts

1. Search: Brady/Giglio/Franks motions nationwide
2. Filter: Last 5 years, favorable defense outcomes
3. Target districts: SDNY, CDCA, NDGA, EDVA

7.2 Identify National Patterns

Compare to EDPA norms:

- Grant rates
- Hearing frequency
- Discovery timelines
- Sanctions frequency

7.3 Log to Tab [07 DOJ_Nationwide_Sample](#)

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STEP EIGHT

Motion Doctrine Library

- Day 3
- 4 hours
- 12 motion types mapped

8.1 Build Authority List for All 12 Motion Types

M01**Brady/Giglio Motion to Compel***Brady v. Maryland*, 373 U.S. 83**M02****Franks Motion + Suppression***Franks v. Delaware*, 438 U.S. 154**M03****Vindictive/Selective Prosecution***United States v. Armstrong*, 517 U.S. 456**M04****Improper Prosecutorial Appointment**

28 U.S.C. § 541

M05**Compel Discovery Status Order**

Fed. R. Crim. P. 16

M06**Daubert Challenges***Daubert v. Merrell Dow*, 509 U.S. 579**M07****Motions in Limine**

Fed. R. Evid. 403

M08**Continuance Motion**

18 U.S.C. § 3161

M09**Count-by-Count MTD**

Fed. R. Crim. P. 12(b)

M10**Sanctions Motion**

Fed. R. Crim. P. 16(d)

M11**Napue (False Testimony)***Napue v. Illinois*, 360 U.S. 264**M12****Leon Good Faith Exception***United States v. Leon*, 468 U.S. 897**■ Priority Legend**

- High Priority (4-5)
- Medium Priority (3)
- Standard (1-2)

8.2 Extract Key Holdings

For each motion type, identify:

1. Elements/standard
2. Burden of proof
3. Schemel's interpretation (if any)
4. Best quote for our facts

8.3 Map to Our Case Facts

Create application matrix in Tab [10_Motion_Doctrine_Library](#)

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STEP NINE

Docket Mastery

- Day 4
- 5 hours
- 100% indexed

9.1 Pull 100% Criminal Docket (24-376)

1. Login to PACER
2. Pull full docket sheet for case 24-376
3. Download ALL attachments
4. Budget: ~\$50-100 (stay under \$3/doc cap)

9.2 Pull 100% Bankruptcy Docket

Same process for bankruptcy case

9.3 Index All Attachments

Log every document in Tab `13_Docket_Attachments_Index` :

- Docket entry number
- Date
- Description
- File path
- Relevance tag

9.4 Reconcile Entry Count vs File Count

■ CRITICAL QC

Docket entry count **MUST** equal file count. If mismatch, identify missing docs and re-download any gaps.

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STEP TEN

Prediction Engine

- Day 4
- 3 hours
- 12 ABCD trees

10.1 Build ABCD Trees by Motion Type

For each of the 12 motion types, create tree:

■ ABCD Tree Structure

- A:** DOJ likely move
- B:** Defense response
- C:** DOJ escalation
- D:** Defense counter (hearing request / order language)

Use CoCounsel prompt:

```
Based on this exemplar, predict DOJ's likely response to a similar motion.  
Output an ABCD tree:  
A: DOJ likely move  
B: Defense response  
C: DOJ escalation  
D: Defense counter (hearing request / order language)
```

10.2 Map DOJ Likely Moves

Cross-reference:

- Dalke patterns (Tab 08)
- DOJ EDPA house style (Tab 06)
- Historical outcomes (Schemel tendencies)

10.3 Script Defense Counters

Log all trees in Tab [12_Prediction_Engine](#)

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STEP ELEVEN

Final Report & QC

- Day 5
- 6 hours
- 25-60 page report

11.1 Compile All Sections

Report Structure (25-60 pages):

1. Executive Summary (2-3 pages)
2. Judge Schemel Profile (5-8 pages)
3. Judge Mayer Profile (4-6 pages)
4. EDPA DOJ House Style (5-8 pages)
5. AUSA Dalke Profile (3-5 pages)
6. Agent Crawley Profile (3-5 pages)
7. DOJ Nationwide Trends (3-5 pages)
8. ABCD Prediction Trees (5-10 pages)
9. Appendix: Most Citable Paragraphs (10-20 pages)

11.2 Verify All Citations

■ CRITICAL

Every quote must be verified against source PDF:

- Check page numbers
- Check paragraph numbers
- Confirm exact wording

11.3 Format Appendices

Organize citable paragraphs by:

1. Motion type
2. Use case
3. Judge

11.4 Quality Control Checklist

- All 14 workbook tabs complete
 - All target counts met or exceeded
 - All quotes verified against source
 - All PDFs organized in folder structure
 - All ABCD trees have source exemplar reference
 - Report formatted consistently
 - Appendix pagination correct
-

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REFERENCE

Workbook Specification

Tab Structure



Tab	Color	Purpose
00_README	■ #404040	Instructions
01_Swimlanes_Plan	■ #1F4E79	Progress tracking
02_Schemel_CaseIndex	■ #00B050	Judge case list
03_Schemel_Exemplars	■ #00B050	Motion packets
04_Mayer_CaseIndex	■ #00B0F0	BK case list
05_Mayer_Exemplars	■ #00B0F0	BK motion packets
06_EDPA_DOJ_CaseIndex	■ #FFC000	DOJ house style
07_DOJ_Nationwide_Sample	■ #FFC000	National trends
08_Dalke_Profile	■ #C00000	AUSA patterns
09_Crawley_Profile	■ #C00000	Agent patterns
10_Motion_Doctrine_Library	■ #7030A0	All 12 motion types
11_Most_Citable_Paragraphs	■ #7030A0	Quote bank

12_Prediction_Engine	■ #002060	ABCD trees
13_Docket_Attachments_Index	■ #000000	Full docket

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REFERENCE

Glossary: Key Legal Terms

302

FBI interview report form

FBI FD-302

AOPC

Application for Order Permitting Capture (wiretap/surveillance warrant)

18 U.S.C. § 2518

Brady Material

Evidence favorable to the accused that is material to guilt or punishment

Brady v. Maryland, 373 U.S. 83 (1963)

Daubert Standard

Federal standard for admissibility of expert testimony based on reliability

Daubert v. Merrell Dow, 509 U.S. 579 (1993)

Franks Hearing

Evidentiary hearing to challenge false statements in warrant affidavits

Franks v. Delaware, 438 U.S. 154 (1978)

Giglio Material

Impeachment evidence about government witnesses

Giglio v. United States, 405 U.S. 150 (1972)

Good Faith Exception

Exception to exclusionary rule when officers rely on facially valid warrant

United States v. Leon, 468 U.S. 897 (1984)

Motion in Limine

Pre-trial motion to exclude prejudicial evidence

Fed. R. Evid. 403

MTD

Motion to Dismiss

Fed. R. Crim. P. 12(b)

Napue Violation

Using or failing to correct known false testimony

Napue v. Illinois, 360 U.S. 264 (1959)

Rule 16

Criminal discovery rule requiring government disclosure

Fed. R. Crim. P. 16

Selective Prosecution

Defense claiming defendant singled out based on protected class

United States v. Armstrong, 517 U.S. 456 (1996)

Speedy Trial Act

Statutory time limits for federal criminal trials

18 U.S.C. § 3161

Vindictive Prosecution

Defense claiming prosecution was retaliation for exercising rights

Blackledge v. Perry, 417 U.S. 21 (1974)

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QUICK REFERENCE

One-Page Summary Matrix

Essential Logins & Tools

WESTLAW EDGE

westlaw.com
Litigation Analytics
enabled

COCOUNSEL 2.0

Thomson Reuters AI
"Search a Database" skill

PACER

pacer.gov
\$0.10/page, \$3 cap/doc

Before Starting (Day 0)

- Westlaw Edge logged in
- CoCounsel 2.0 accessible
- PACER account funded
- Workbook template open
- Folder structure created

Day 1 Targets

- 60 Schemel cases indexed
- 30 Mayer cases indexed
- 15 Schemel exemplars pulled
- 10 Mayer exemplars pulled
- 15 citable paragraphs logged

Day 2 Targets

- Crawley affidavits collected
- Franks vulnerabilities flagged

Day 3 Targets

- 40 nationwide matters sampled
- 12 motion types documented

15 Dalke cases indexed

30 DOJ oppositions sampled

15 citable paragraphs logged

Authority lists complete

Key holdings extracted

20 citable paragraphs logged

Day 4 Targets

Criminal docket 100% pulled

Bankruptcy docket 100% pulled

All attachments indexed

Entry count = File count

12 ABCD trees built

Day 5 Deliverables

Final report compiled (25-60 pp)

All citations verified

Appendices formatted

QC checklist complete

Workbook finalized (14 tabs)

Daily Rhythm

Time Block	Activity	Duration
GRAB	Document collection from Westlaw/PACER	3 hours
ANALYZE	CoCounsel extraction + coding	3 hours
RECORD	Update spreadsheet + verify cites	2 hours

Key File Paths

Item	Path
Workbook	EDPA_Intel_Workbook_V2.xlsx

Westlaw Root

EDPA_24-376_Research/

CoCounsel DB

EDPA_24376_Research_[YYYYMMDD]

File Naming

YYYY-MM-DD_Doc#_DocType_Party_ShortTitle.pdf

Emergency Contacts

Issue	Action
Westlaw down	Use PACER docket search as backup
CoCounsel timeout	Break query into smaller chunks
PACER over budget	Prioritize orders + key motions only
Missing document	Check RECAP archive (courtlistener.com)

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Case: US v. Redmond, EDPA 24-376

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