

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



|                              |                                   |                                     |                                  |                         |
|------------------------------|-----------------------------------|-------------------------------------|----------------------------------|-------------------------|
| Judges<br>Schemel +<br>Mayer | Prosecutors<br>Crawley +<br>Dalke | Library<br>Nationwide +<br>Doctrine | Integration<br>Dockets +<br>ABCD | Delivery<br>Report + QC |
|------------------------------|-----------------------------------|-------------------------------------|----------------------------------|-------------------------|

| 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/  
│ └─ Scheme1_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_Scheme1_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/Scheme1_Cases/{case_number}/`
3. Use naming: `YYYY-MM-DD_Doc#_DocType_Party_ShortTitle.pdf`
4. Log in Tab `03_Scheme1_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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