

UNITED STATES OF AMERICA

v.

Manning, Bradley E.
PFC, U.S. Army,
HHC, U.S. Army Garrison,
Joint Base Myer-Henderson Hall
Fort Myer, Virginia 22211

Authentication Plan

19 August 2013

Assumptions

1. Each attorney will review 400 pages of transcript per day.
2. The defense will have three full time attorneys working on the errata until 1 October 2013, and both parties will complete 1,200 pages of errata per day.
3. Court reporters update transcripts at a rate of one page of errata per hour.
4. Both parties have already begun completing the errata.
5. As of the date of this filing, the transcript is complete up to 12 June 2013.
6. The transcript is currently approximately 6,000 pages long, and the court reporters estimate the total length will be 13,000 pages long.
7. Two of the MDW DA civilian court reporters will leave MDW on 7 September 2013. Replacements have not been identified, although two hiring actions are pending.
8. MDW continues to have contracted court reporting services funded and available.
9. Following adjournment, the prosecution team must perform 100% accountability of all classified information and equipment at Fort Meade and redeploy to Fort McNair.
10. The redeployment of the prosecution team will be conducted in phases which will allow for the trial counsel to transition from the redeployment process to executing the errata process.
11. MAJ Fein, CPT(P) Morrow, CPT von Elten, and CPT Mitroka will remain at MDW to complete the authentication process, and CPT Overgaard and CPT Whyte will be available for any issues that might arise. The current trial counsel will remain responsible for the record of trial.

APPELLATE EXHIBIT 665
PAGE REFERENCED: _____
PAGE ____ OF ____ PAGES

Authentication Plan

1. Although both parties have started the errata process, the parties will begin the errata process full-time NLT 3 September 2013. Each party will review 1,200 pages of transcript per day.
2. The parties will complete the portions of the transcript relating to the closed and classified sessions, so those may be released to the public and media as soon as possible. After those portions are completed, the parties will start from the arraignment and work forward to ensure they complete the same portions. At the close of each day, the errata will be sent to the MDW court reporters for updating of the transcript. The MDW court reporters will update the transcript based on the parties' errata.
3. Once each 1,200 page portion of the transcript is updated by the MDW court reporters, the prosecution team will print the transcript for the Court's authentication. The OSJA, MDW will provide the Court with adequate workspace at Fort McNair to perform authentication of the transcript.
4. On 9 September 2013, the parties will hold a conference call to determine whether the 1,200 page standard is sufficient, and then provide the Court an update via email.
5. The parties should complete the initial errata process before all the court reporters complete the transcript, and will complete the initial errata process before the MDW court reporters complete updating the transcript based on the errata. After the first wave, the parties will reassess the process and provide any recommendations to the Court.
6. The prosecution anticipates the transcript will be ready for the Court's review no earlier than 17 September 2013. The prosecution will notify the Court if it needs more time to prepare the transcript for authentication. Based on this proposed plan, the Court's receipt of the transcript for authentication should be uninterrupted.



ASHDEN FEIN
MAJ, JA
Trial Counsel