

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA,

*Plaintiff,*

v.

HO WAN KWOK,

*Defendant.*

Case No. 1:23-CR-118-1 (AT)

**NOTICE OF DEFENDANT HO WAN  
KWOK'S MOTIONS *IN LIMINE***

**ORAL ARGUMENT REQUESTED**

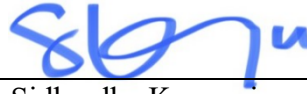
Defendant Ho Wan Kwok, through his undersigned counsel, respectfully moves the Court for an order (1) precluding the government, pursuant to Federal Rules of Evidence 401, 402, 403 and 404(b), from introducing certain evidence, using certain terminology and/or making certain arguments, as discussed in further detail below; (2) requiring the government to produce all orally communicated *Brady* material immediately; (3) excluding the testimony of the government's purported cryptocurrency expert; (4) reserving his right to object to the admissibility of certain metadata evidence; and (5) granting Mr. Kwok such other and further relief as this Court deems just and proper.

Defendant moves upon the Declaration of Sidhardha Kamaraju, Esq., the exhibits annexed thereto, the accompanying Memorandum of Law, and all prior papers and proceedings had herein.

Defendant respectfully requests oral argument on this motion.

Dated: April 9, 2024  
New York, New York

Respectfully submitted,



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