

3. The government will be making a formal plea offer shortly. Defense counsel have indicated that they will need a period to review the offer both individually and with their clients and propose any counteroffer as befits the situation. If defendants accept the offer, the parties will additionally need time to negotiate a Statement of Offense that adequately reflects the defendants' conduct and meets the elements of any offense to which they are pleading guilty.

4. The parties remain engaged in good faith negotiations with the view towards a pretrial resolution. **The parties propose to allow the parties to file a subsequent joint status report approximately sixty days from today, specifically Tuesday, September 20, 2022, or thereabouts.** The parties expect to discuss in the next status report defense counsels' review of discovery and discussion of proposed next steps.

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5. Consistent with the attached proposed Order, the government requests, and the defendants through their counsel consent to the Court excluding all time between today and the next status report from calculation under the Speedy Trial Act.

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