

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA :
 :
 v. : **CASE NO. 21-CR-483 (DLF)**
 :
 EDWARD FRANCISCO RODRIGUEZ, :
 :
 Defendant. :
 _____ :
 :

JOINT STATUS REPORT

The United States of America, by and through its attorney, the United States Attorney for the District of Columbia, and defendant Edward Francisco Rodriguez, by and through his attorney, Nora Hirozawa, now submit this joint status report, requested by the Court on December 1, 2022.

1. At the last hearing on December 1, 2022, Mr. Rodriguez through counsel expressed his desire to plead guilty to Count Two of the Superseding Indictment, which charges violations of 18 USC 111(a)(1) and (b), Assaulting, Resisting, or Impeding Certain Officers Using a Dangerous Weapon, Inflicting Bodily Injury. The government was prepared to provide the Court with the elements of those offenses and a factual basis for the guilty plea. The Court advised the parties that it would not accept Mr. Rodriguez's plea unless the government agreed to dismiss the remaining charges alleged in the Superseding Indictment at sentencing. The government was not willing to dismiss the remaining charges at sentencing since Mr. Rodriguez was entering an open plea and not pursuant to a negotiated plea agreement.
2. On March 17, 2022, a plea offer was made to Mr. Rodriguez and delivered via email to counsel.

3. Ms. Hirozawa has communicated to the government that Mr. Rodriguez does not accept the government's plea offer.
4. Ms. Hirozawa has communicated to the government that Mr. Rodriguez intends to waive his right to a trial by jury and requests a bench trial on all charges alleged in the Superseding Indictment.
5. At this point, all case-specific discovery has been produced to the defense. The government is prepared to share any case-specific discovery again upon request of counsel. If any additional evidence is located, the government will produce it to the defense in a timely manner.
6. The government has made all global productions available on the defense instances of Relativity and Evidence.com. Since the last status hearing on September 27, 2022, global productions were made on September 28, 2022, October 12, 2022, November 8, 2022, November 28, 2022, and December 12, 2022.
7. The government expects to make additional global productions, which should include, *inter alia*, the scoped results of search warrants conducted on other January 6th defendant's electronic devices and social media accounts, recorded custodial interviews of January 6th defendants, and additional materials in the custody and control of the FBI that may be relevant to the defendant.
8. The parties request that the Court schedule a status hearing to set a pretrial briefing schedule in anticipation of trial.
9. The parties are in agreement that the ends of justice would be served by the exclusion of time under the Speedy Trial Act until the next status conference before this Court to

permit the preparation of pretrial motions. Accordingly, the parties jointly request that time be excluded between today's date through the date of the next status conference.

Respectfully submitted,

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