UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

v.

Crim. Action No. 21CR184 (BAH)

JAMES ALLEN MELS,

Defendant.

JOINT RESPONSE TO MINUTE ORDER

The undersigned parties hereby jointly respond to the Minute Order dated March 31, 2022, directing the parties to "inform the Court by noon on April 4, 2022, whether the outstanding plea offer made on September 21, 2021, referenced in the defendant's Unopposed Motion to Continue Status Hearing [ECF. No. 32] will have expired by April 5, 2022, and if so, providing the Court with three proposed trial dates and proposed motions schedule, so that a trial and motions schedule may be set at the April 5, 2022, hearing."

In accordance with the Minute Order, the parties hereby notify the Court that the plea offer has expired and propose the following trial dates: August 29, 2022, September 5, 2022, November 1, 2022. The parties request a trial by jury and anticipate the trial will take approximately one week. The parties propose that motions be due June 30, 2022, and that responses be due on July 20, 2022. Following the status hearing, the parties will submit a proposed order setting forth the trial and motions schedule adopted by the Court.

Respectfully Submitted,

A.J. KRAMER FEDERAL PUBLIC DFENDER

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By: <u>/s/ Benjamin Kringer</u>

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