

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

<b>UNITED STATES OF AMERICA</b>	:	
	:	
<b>v.</b>	:	<b>CASE. NO. 21-CR-141-RDM</b>
	:	
	:	
<b>MICHAEL SHANE DAUGHTRY,</b>	:	
	:	
<b>Defendant</b>	:	

**JOINT STATUS REPORT**

The United States, by and through its attorney, the United States Attorney for the District of Columbia, and Defendant, by and through his attorney, Timothy R. Saviello, Esquire (collectively, “the Parties”), respectfully submit this status report, as directed by the Court, and state as follows:

1. On February 19, 2021, the defendant, Michael Shane Daughtry was charged by way of information with (Count One) Entering and Remaining in a Restricted Building or Grounds in violation of Title 18 U.S.C. § 1752(a)(1); (Count Two) Disorderly and Disruptive Conduct in a Restricted Building or Grounds in violation of Title 18 U.S.C. § 1752(a)(2); and (Count Three) Impeding Ingress and Egress in a Restricted Building or Ground and Aiding and Abetting in violation of Title 18 U.S.C. § 1752(a)(3) and 2. ECF 6.

2. The defendant has been out on bond since his initial arrest on January 12, 2021. Defendant remains compliant with conditions of release.

3. On December 17, 2020, the Chief Judge issued Standing Order 20-93, governing Court operations due to the COVID-19 pandemic, and excluding time under the Speedy Trial Act (“STA”) until March 15, 2021, except in limited cases, when the Court expected to resume

operations. On March 5, 2021, as detailed in Standing order 21-10, the Court again found due to the exigent circumstances created by the COVID-19 pandemic, the time period from March 15, 2020 through August 31, 2021, would be excluded in criminal cases under the STA.

4. The parties appeared for a video status conference on March 17, 2021 and agreed to exclude time from The Speedy Trial Act calculation until May 3, 2021. On May 3, 2021, the Court reviewed a Joint Status Report and granted the government's Unopposed Motion to Exclude Time under the Speedy Trial Act, tolling time until July 2, 2021. On July 2, 2021, the Court reviewed and granted the government's Motion to Exclude Time under the Speedy Trial Act, tolling time until August 31, 2021.

5. On August 25, 2021, in recognition of the current high rate of transmission of the Delta variant in the District of Columbia, Chief Judge Howell issued Standing Order 21-47, limiting the number of jury trials that may be conducted at one time until at least October 31, 2021 and prioritizing trials with detained defendants. Further, the Court found that "for those cases that cannot be tried consistent with those health and safety protocols and limitations, the additional time period from August 31, 2021 through October 31, 2021 is excluded under the Speedy Trial Act as the ends of justice served by the continuances to protect public health and safety and the fair rights of a defendant outweigh the best interest of the public and any defendant's right to a speedy trial, pursuant to 18 U.S.C. 3161(h)(7)(A)."

6. Since the last status, defendant obtained new counsel, Timothy R. Saviello, and filed a notice of request for discovery (ECF 26). The government filed a Memorandum Regarding Status of Discovery as of August 23, 2021 (ECF 28). Discovery in this matter is ongoing.

7. Parties are agreed to a 60-day continuance of this matter and to excluding related

