

**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 of America, through undersigned counsel, 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 January 15, 2021 arrest and 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 until March 15, 2021, except in limited cases, when the Court expected to resume operations. On March 5<sup>th</sup> and again on August 25<sup>th</sup>, 2021, as detailed in Standing Orders 21-10 and 21-47,

the Chief Judge again found due to the exigent circumstances created by the COVID-19 pandemic, the time period from March 15 through October 31, 2021, would be excluded in criminal cases under the Speedy Trial Act (STA).

4. Since the Initial Appearance on March 8, 2021, the Court has ordered the exclusion of time from Speedy Trial calculations through October 29, 2021, collectively. The Court has also ordered parties to file a joint status report on or before October 29, 2021.

5. Since the last status report, pursuant to a protective order the government has provided to undersigned defense counsel the following discovery: (1) reports from U.S. Capitol Police investigations of alleged wrongdoing by Capitol Police officers on January 6, 2021; (2) 42 Metropolitan Police Department (MPD) internal investigation reports and exhibits; (3) 4,044 files of Capitol Police closed caption video; (4) maps of the U.S. Capitol; (5) Capitol police radio communications and draft transcripts; and (6) a spreadsheet of MPD radio location information. The government has also shared significant discovery to defense evidence.com instance including 11,176 files of Capitol Police Close Circuit Video footage and 1,676 files of MPD body-worn-camera footage. The undersigned defense counsel is pending access to defense instance evidence.com.

Parties are agreed to a 60-day continuance of this matter and to excluding the time within which the trial must commence under the Speedy Trial Act, 18 U.S.C. § 3161 et seq.

