UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

:

v. : Case No. 21-cr-123 (PLF)

:

VITALI GOSSJANKOWSKI,

:

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 Vitali GossJankowski, through counsel, hereby submit the following Joint Status Report, pursuant to the Minute Order this Court issued on June 7, 2022:

- Since the last status conference on April 12, 2022, the United States provided materials
 to defense counsel on April 6, 2022 and May 9, 2022 as part of its ongoing global
 discovery production.
- The United States has provided three screenshots of the defendant taken from opensource videos after discovering that the defendant appeared in the videos. Links to the full videos have been forwarded to defense counsel.
- 3. The defense is reviewing the voluminous global discovery provided.
- 4. The parties have been engaged in plea discussions. At the time of the April 12, 2022 status conference, the parties were addressing a proposed counter-offer to the plea agreement originally extended by the United States. The proposal did not succeed in bringing the parties to an agreement; however, the parties have regrouped and are exploring an alternative resolution. Defense counsel have advised that the defendant is willing to consider any other offer that the government extends.

- Accordingly, the parties jointly recommend scheduling a status conference in approximately 30 days and suggest the week of July 18, 2022, or a date convenient for the Court.
- 6. The parties believe it is in the interest of justice to toll the Speedy Trial Act while the parties continue to pursue negotiations and review discovery. The parties thus request a tolling of the Speedy Trial Act, pursuant to 18 U.S.C. § 3161(h)(7)(A), based on the factors described in 18 U.S.C. 3161(h)(7)(B)(i) and (iv). Therefore, the parties request an exclusion of time under the Speedy Trial Act from January 13, 2022, through the next scheduled status date.

Respectfully submitted,

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¹ Government co-counsel changed at the time of the last status conference, and any tolling under the Speedy Trial Act would permit co-counsel to continue reviewing case materials, prepare as needed for future proceedings, and contribute to continuity in the government's advocacy.