

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

UNITED STATES OF AMERICA

v.

CHRISTOPHER RAPHAEL SPENCER,

Defendant.

:
:
:
:
:
:
:
:

Case No. 21-cr-147-1 (CKK)

JOINT STATUS REPORT AND MOTION TO CONTINUE STIPULATED TRIAL

The United States of America, by and through its attorney, the United States Attorney for the District of Columbia, and Ubong Akpan, counsel for Christopher Raphael Spencer (“the defendant”), hereby submit the following Joint Status Report. The parties also respectfully move the Court to continue the Stipulated Trial currently scheduled for January 16, 2024, and associated dates for a period of approximately 30 days, and to exclude the intervening time under the Speedy Trial Act. In support of the Motion, the parties represent:

1. The defendant is before the Court charged in an indictment with: Obstruction of an Official Proceeding, in violation of Title 18, United States Code, § 1512(c)(2) and (2); Entering and Remaining in a Restricted Building, in violation of Title 18, United States Code, § 1752(a)(1); Disorderly and Disruptive Conduct in a Restricted Building, in violation of Title 18, United States Code, § 1752(a)(2); Disorderly Conduct in a Capitol Building, in violation of Title 40, United States Code, § 5104(e)(2)(D); and Parading, Demonstrating, or Picketing in a Capitol Building, in violation of Title 40, United States Code, § 5104(e)(2)(G) (ECF No. 14).

2. After a conference, a stipulated trial was scheduled for January 16, 2024. In accordance with the trial date, the parties were directed to file a report on the agreed-upon facts of the case by December 15, 2023 and attend a status conference on January 5, 2024.
3. Counsel for the government will unexpectedly be out of the country from January 9 through January 15, 2024. Additionally, both counsel for the government and counsel for defense had trials in December on other matters that prevented the parties from coming to an agreement on the facts of this matter as of this time.
4. The parties believe it is in the interest of justice to toll the Speedy Trial Act while the stipulated trial is pending. 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), (ii), and (iv), as well as 18 U.S.C. § 3161(h)(1)(G).
5. Therefore, the parties request the January 16, 2024 Stipulated Trial and associated dates be continued for approximately 30 days, and that there is an exclusion of time under the Speedy Trial Act from December 15, 2023 through the Stipulated Trial.
6. The defendant is out of custody.
7. The defendant concurs with this request.

/s/

 Ubong Akpan, Esq.
 Federal Public Defender
 Counsel for Christopher Spencer
 625 Indiana Ave, NW
 Suite 550
 Washington, D.C. 20004
 (202) 208-7500
 Ubong_Akpan@fd.org