

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

UNITED STATES OF AMERICA

v.

**JONATHANPETER ALLEN KLEIN and
MATTHEW LELAND KLEIN,**

Defendants.

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Case No. 21-CR-237 (RDM)

JOINT STATUS REPORT

The United States of America, by and through its attorney the United States Attorney for the District of Columbia, defendant Jonathanpeter Allen Klein, by and through his attorney Michelle M. Sweet, Esq., and defendant Matthew Leland Klein, by and through his attorney Eugene Gorokhov, Esq., provide this Joint Status Report to the Court.

1. Upon consideration of the parties' September 29, 2021 Joint Status Report, (Dkt. 102), the Court directed the parties to file a further joint status report on or before December 3, 2021. The Court also tolled the defendants' Speedy Trial rights in the interest of justice from October 1, 2021, to December 3, 2021.

2. As described in the government's Memorandum Regarding Status of Discovery as of October 21, 2021, (Dkt. 110), and its Memorandum Regarding Status of Discovery as of November 5, 2021, (Dkt. 113), the government has continued to provide access to voluminous discovery to the defendants in the Capitol Riot related cases. *See* Dkt. 110 at 2-3; Dkt. 113 at 1-3. In addition, the government has continued to work with the Federal Public Defender and Deloitte Financial Advisory Services, LLP, to provide access to discovery materials through the defense Relativity environment. *See* Dk.t 113 at 2. The government has also continued to provide case specific discovery to the defendants in the instant matter. *See* Dkt. 118.

3. It is the government's position that, at present, almost all of the case specific materials, discoverable at this time, have been tendered and/or made available to the defendants. The government will continue to produce such items as they become available.

4. Given the volume of discovery that has been and is expected to be produced, the defendants need additional time to meaningfully review such discovery and determine how best to proceed in this matter, including making decisions regarding the filing of pretrial motions.

5. The parties request that the Court set this matter for an additional Joint Status Report to be filed on or before February 28, 2022, by 12:00 p.m.

6. The parties agree that time should be excluded under the Speedy Trial Act from December 3, 2021, through February 28, 2022, in the interest of justice for the reasons previously provided by the Court.

7. The undersigned Assistant U.S. Attorney has received permission from counsel for both defendants to file this Joint Status Report.

Respectfully submitted,

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