

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

UNITED STATES OF AMERICA	:	
	:	
v.	:	Case No. 21-CR-237 (RDM)
	:	
JONATHANPETER ALLEN KLEIN and	:	
MATTHEW LELAND KLEIN,	:	
	:	
Defendants.	:	

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. On December 2, 2021, upon consideration of the parties' November 30, 2021 Joint Status Report, (Dkt. 119), the Court directed the parties to file a further joint status report on or before February 28, 2022. The Court also tolled the defendants' Speedy Trial rights in the interest of justice from December 3, 2021, to February 2022.

2. As described in the government's Memorandum Regarding Status of Discovery as of February 9, 2022, (Dkt. 126), the government has continued to provide access to voluminous discovery to the defendants in the Capitol Riot related cases. The government has also continued to provide case specific discovery to the defendants in the instant matter.

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 April 29, 2022, by 12:00 p.m.

6. The parties agree that time should be excluded under the Speedy Trial Act from February 28, 2022, through April 29, 2022, in the interest of justice for the reasons previously provided by the Court.

7. Neither defendant is in pretrial custody.

8. 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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