

**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 August 26, 2022, upon consideration of the parties’ August 26, 2022 Joint Status Report, (Dkt. 133), the Court directed the parties to file a further joint status report on or before October 28, 2022. The Court also tolled the defendants’ Speedy Trial rights in the interest of justice from August 29, 2022, to October 28, 2022.

2. Since filing the last Joint Status Report, the government has continued to provide global discovery to the defendants in the Capitol Riot related cases.

3. It is the government’s position that, at present, 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. The parties continue to engage in discussions towards pursuing resolution of this matter short of trial and require additional time to determine whether such a resolution is achievable.

5. In addition, 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.

6. The undersigned counsel's temporary detail to the U.S. Attorney's Office for the District of Columbia is ending and new government counsel is to be assigned. Such new counsel will require additional time to transition into this matter.

7. The parties request that the Court set this matter for an additional Joint Status Report to be filed on or before January 27, 2023, by 12:00 p.m.

8. The parties agree that time should be excluded under the Speedy Trial Act from October 28, 2022, through January 27, 2023, in the interest of justice for the reasons previously provided by the Court.

9. Neither defendant is in pretrial custody and this request for additional time is not made for the purposes of causing unnecessary delay.

10. 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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