

**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 April 26, 2023, upon consideration of the parties' Joint Status Report filed the on April 25, 2023, Doc. 140, the Court directed the parties to file a further joint status report on or before July 26, 2023. The Court also tolled the defendants' Speedy Trial rights in the interest of justice from April 27, 2023 through July 26, 2023. *See* 4/26/23 Minute Order.

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 require additional time to discuss a potential resolution of this matter short of trial.

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 parties request that the Court set this matter for an additional Joint Status Report to be filed on or before September 26, 2023, by 12:00 p.m.

7. The parties agree that time should be excluded under the Speedy Trial Act from July 26, 2023 through September 26, 2023, in the interests of justice for the reasons previously provided by the Court.

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

9. 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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