

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

<b>UNITED STATES OF AMERICA</b>	:	
	:	
<b>v.</b>	:	<b>Case No. 21-cr-382 PLF</b>
	:	
<b>CHRISTOPHER WARNAGIRIS</b>	:	
	:	
<b>Defendant.</b>	:	

**JOINT STATUS REPORT RELATED TO PROTECTIVE ORDER STATUS**

Pursuant to this Court’s minute order of September 15, 2021, the parties hereby notify the Court of the current status of the parties’ negotiations related to the Government’s proposed protective order:

1. The parties have met and conferred in an attempt to reach an agreement on a proposed protective order (ECF No. 16) related to discovery in the above referenced matter.
2. Despite considerable communications, the parties are unable to reach agreement on the Government’s proposed order.
3. The primary dispute rests with the Government’s designation of internal Capitol security video that the Government will designate as “highly sensitive” once the current proposed protective order is entered.
4. The Government has not yet provided the relevant video to the Defendant because the proposed protective order has not been entered. Should this Court enter the order, the Government will immediately provide the video under the order’s “highly sensitive” designation. Thereafter, and pursuant to the mechanisms in the order, the Defendant may contest the “highly sensitive” designation.

